

EXHIBIT A

TO BE FILED UNDER SEAL

**Pursuant to U.S. District Judge Arun Subramanian's
Civil Individual Practices 11(B)**

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
2 Case No. 1-19-cv-09193-PGG

- - - - -x

3 JOHN P. "JACK" FLYNN, LESLIE A. :
FLYNN, :

4 Plaintiffs, :

5 - vs - :

6 CABLE NEWS NETWORK, INC., :

7 Defendant. :

8 - - - - -x

9
10 February 27, 2023
10:30 a.m.
11 1251 6th Avenue
12 New York, NY
13
14

15 ***HIGHLY CONFIDENTIAL***
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20 DEPOSITION UPON ORAL EXAMINATION OF
21 DONIE O'SULLIVAN, held at the above-mentioned
22 time and place, before Randi Friedman, a
23 Registered Professional Reporter, within and for
24 the State of New York.
25

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 STEVEN S. BLISS LAW OFFICES 3 Attorneys for Plaintiffs 4 300 West Main Street, Suite 102 5 Charlottesville, Virginia 22903 6 BY: STEVEN S. BLISS, ESQ. 7 DAVIS WRIGHT TREMAINE LLP 8 Attorneys for Defendant 9 1251 Avenue of the Americas 10 21st Floor 11 New York, New York 10020 12 BY: KATHERINE M. BOLGER, ESQ. 13 MEENU KRISHNAN, ESQ. 14 *** 15 16 17 18 19 20 ALSO PRESENT: 21 Mary Kate Tischler, Esq.(CNN) 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 * * * 2 DONIE O'SULLIVAN, the witness 3 herein, having been duly sworn, was examined 4 and testified as follows: 5 * * * 6 EXAMINATION 7 BY MR. BISS: 8 Q Good morning, sir. Will you state 9 your full name for the record? 10 A Donie Conor O'Sullivan. 11 Q Mr. O'Sullivan, my name is Steve Biss, 12 I'm an attorney from Charlottesville, Virginia. 13 I represent Jack Flynn, Leslie Flynn, in a case 14 pending in the Southern District of New York 15 that's styled Flynn versus Cable News Network. 16 We're here today for your deposition. 17 I also represent Valerie Flynn and 18 Lori Flynn in connection with some litigation 19 that's pending in the Middle District of Florida. 20 Are you aware of that litigation as well? 21 A Yes. 22 Q Okay. So I have an agreement with 23 counsel for CNN to use the discovery in the 24 Southern District of New York case in the Middle 25 District of Florida cases. Are you aware of</p>
<p style="text-align: right;">Page 3</p> <p>1 STIPULATIONS 2 IT IS HEREBY STIPULATED AND AGREED, by 3 and among counsel for the respective parties 4 hereto, that the filing, sealing and 5 certification of the within deposition shall be 6 and the same are hereby waived; 7 IT IS FURTHER STIPULATED AND AGREED 8 that all objections, except as to form of the 9 question, shall be reserved to the time of the 10 trial; 11 IT IS FURTHER STIPULATED AND AGREED 12 that the within deposition may be signed before 13 any Notary Public with the same force and effect 14 as if signed and sworn to before the Court. 15 *** 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 that? 2 MS. BOLGER: I don't know that 3 I've told him that, Steve, but we do have 4 that agreement. I'll note that the Valerie 5 Flynn case was dismissed, but we're not 6 going to say not to take discovery on that 7 case. 8 BY MR. BISS: 9 Q Mr. O'Sullivan, I'm going to ask you 10 some questions today and you're here to provide 11 answers. I want to go over just a couple of road 12 rules to sort of facilitate this process, make it 13 easier for you and me and everybody else in the 14 room and easier for the court reporter, who's 15 taking down your transcript -- your testimony. 16 If any of my questions are unclear in 17 any way, will you tell me? 18 A Sure. 19 Q Okay. I do want to get answers to my 20 questions today, so I'm not interested in having 21 you volunteer information or volunteer -- if I 22 ask you what color the light was, I just want to 23 know what color the light was. I don't want to 24 know where you went to high school and anything 25 like that. So if you could just answer my</p>

<p style="text-align: right;">Page 6</p> <p>1 questions, that will help us get through this 2 faster.</p> <p>3 MS. BOLGER: I object to the 4 instruction. The witness should tell the 5 truth and the whole truth, but you can ask 6 whatever you want.</p> <p>7 MR. BISS: Okay.</p> <p>8 BY MR. BISS:</p> <p>9 Q And my third road rule is I don't want 10 you to speculate. I'm interested in your 11 firsthand knowledge. If there's a question that 12 I ask you that -- that you don't know the answer 13 to, will you just be forthright and tell me that?</p> <p>14 A Sure.</p> <p>15 Q And the last road rule is hopefully 16 going to be the easiest one to follow, and that 17 is, I don't want to argue with you today, I don't 18 want to quibble. Will you just answer my 19 questions and that type of thing?</p> <p>20 A Sure.</p> <p>21 Q Okay. All right.</p> <p>22 Mr. O'Sullivan, sitting with me here 23 in the deposition room is Jack Flynn, one of the 24 plaintiffs in the case. Have you ever met Jack 25 Flynn before today?</p>	<p style="text-align: right;">Page 8</p> <p>1 in -- I'm going to call it the New York 2 litigation, if that's okay with you -- memorandum 3 opinion and order entered in the New York 4 litigation on August 12, 2022.</p> <p>5 Have you ever seen this document 6 before today?</p> <p>7 A I believe I've reviewed it, yes.</p> <p>8 Q Okay. And I want you to turn to 9 Page 5 of the memorandum opinion and order, and I 10 just want to -- I just want to read into the 11 record a portion of the memorandum opinion and 12 order that begins on the bottom of Page 5, and it 13 says, quote, "Nothing in CNN's report suggests 14 that a QAnon follower is someone who merely 15 engages with the movement on Twitter in the sense 16 that a fan might follow their favorite actor. 17 Rather, in the context of CNN's report, the term 18 'QAnon follower' would be reasonably understood 19 by a viewer to mean an adherent to the QAnon 20 movement in the sense that a member of a faith 21 follows its belief system. The report, which was 22 aired roughly a month after the January 6, 2021 23 attack on the United States Capitol, focuses on 24 individuals attending a QAnon meeting with 25 prominent figures in the QAnon movement. Among</p>
<p style="text-align: right;">Page 7</p> <p>1 A No. No.</p> <p>2 Q Have you ever spoken with Jack Flynn 3 on the phone?</p> <p>4 A No.</p> <p>5 Q Have you ever in your lifetime ever 6 had or ever attempted to make any contact with 7 Jack Flynn for any reason?</p> <p>8 A Not that I can recall.</p> <p>9 Q I'm going to show you some documents 10 today. There's 58 in total. Hopefully we'll -- 11 hopefully we'll get through most of these very 12 quickly.</p> <p>13 A All right.</p> <p>14 Q So the first document I'm going to 15 hand you, I'm going to mark it as Exhibit 1 to 16 this deposition.</p> <p>17 (Exhibit 1 was marked.)</p> <p>18 I'm going to slide them across the 19 table, hopefully not quickly, but I'll slide them 20 across the table. I've got a copy here for 21 Ms. Bolger as well.</p> <p>22 MS. BOLGER: Thanks.</p> <p>23 BY MR. BISS:</p> <p>24 Q Mr. O'Sullivan, this is a copy of a 25 memorandum opinion and order that was entered</p>	<p style="text-align: right;">Page 9</p> <p>1 other things, the report shows a speaker at the 2 meeting state, 'We are at war now and we in this 3 room understand that very, very much.' One of 4 the individuals at the meeting, known as the 5 QAnon Shaman, is shirtless, has his face painted, 6 and is wearing a horned headdress and a QAnon 7 flag as a cape. The report states that at least 8 two people at the meeting were in Washington, 9 D.C. on January 6, including the QAnon Shaman, 10 who stormed the Capitol. The report interposes 11 footage of the QAnon meeting with violent footage 12 from the January 6 attack. A commentator 13 explains that the people at the meeting 'felt 14 like they were part of something big and 15 revolutionary and that they were opposing 16 absolute evil.'</p> <p>17 "The Flynns further allege that in 18 CNN's own words, QAnon is a 'cult' and that 19 'trusting the plan was an important part of QAnon 20 belief.' In this context a viewer would 21 reasonably understand that a QAnon follower is an 22 adherent to the QAnon belief system, including 23 the belief that a high-ranking government insider 24 known as Q -- known as 'Q' is exposing a cabal of 25 Satan-worshipping pedophiles which controls the</p>

<p style="text-align: right;">Page 10</p> <p>1 government, not merely someone who read or 2 forwarded tweets about QAnon." 3 Are you aware that the District Court 4 has defined the term "QAnon follower" in the 5 context of the CNN report? 6 MS. BOLGER: Object to the form. 7 Calls for a legal conclusion. 8 BY MR. BISS: 9 Q Are you aware that the judge has 10 decided what a QAnon follower means? 11 MS. BOLGER: Object to the form. 12 You can answer. 13 THE WITNESS: I'm aware of this, 14 yes. 15 BY MR. BISS: 16 Q Do you agree with the judge's 17 definition of QAnon follower? 18 MS. BOLGER: Object to the form. 19 Calls for a legal conclusion. 20 You can answer. 21 THE WITNESS: No. 22 BY MR. BISS: 23 Q Do you intend to object to the judge's 24 definition of "QAnon follower"? 25 MS. BOLGER: Object to the form.</p>	<p style="text-align: right;">Page 12</p> <p>1 sir. I'm going to show you a document. 2 A Thank you. 3 Q Let me take that back for one second. 4 A You need to mark it? 5 Q Yeah. 6 (Exhibit 2 was marked.) 7 Let me show you a document, 8 Mr. O'Sullivan, I've marked as Exhibit 2 for 9 identification. This is a copy of Jack and 10 Leslie Flynn's Amended Complaint. Have you ever 11 seen this document before? 12 A I have. 13 Q Okay. All right. Let's go back to 14 Exhibit 1 for one moment. And I want to ask you 15 to turn to Page 7. I'm going to quote from the 16 first full paragraph. 17 "Further, the Flynn's tweets, which 18 Judge Cave determined were integral to the 19 complaint and could therefore be considered in 20 connection with the motion to dismiss, do not 21 establish that the Flynn's are adherents to the 22 QAnon credo." 23 Do you see that? 24 A Yes. 25 Q Do you agree with that statement?</p>
<p style="text-align: right;">Page 11</p> <p>1 Calls for a legal conclusion. He wouldn't 2 know the answer to that. 3 BY MR. BISS: 4 Q Do you understand, Mr. O'Sullivan, 5 you're bound by the court's order? 6 MS. BOLGER: Object to the form. 7 That's a legal conclusion. He's not lawyer. 8 I'm not going to let him answer questions 9 about being a lawyer. 10 BY MR. BISS: 11 Q I'm going to ask you a series of 12 questions today about the QAnon belief system. 13 Would you consider yourself to be an 14 expert in QAnon? 15 A I've reported on it for a good number 16 of years, I guess since it's been around, since 17 2017, and I've further reported on 18 disinformation, misinformation online for almost 19 decades. I'm certainly done a lot of reporting 20 on QAnon, yes. 21 Q Do you consider yourself an expert? 22 A I would consider myself a -- one of 23 the -- it's part of my beat, so, yes, I know a 24 lot about it. 25 Q Okay. You can set that to the side,</p>	<p style="text-align: right;">Page 13</p> <p>1 MS. BOLGER: Object to the form to 2 the extent it calls for a legal conclusion 3 about what's included or not in the 4 complaint. 5 But you can otherwise answer. 6 THE WITNESS: Do I agree with what 7 the judge has said here? 8 BY MR. BISS: 9 Q Yeah, that the Flynn's tweets do not 10 establish that the Flynn's are adherents to the 11 QAnon credo. Do you agree with that statement? 12 MS. BOLGER: Same objection. 13 THE WITNESS: Well, first I would 14 say that I think the premise of the 15 statement that you read is not wholly 16 accurate in that I didn't call the Flynn's 17 QAnon followers or necessarily in the report 18 adherents to the QAnon credo. What the 19 report did was establish that the Flynn's had 20 taken the so-called QAnon oath. 21 BY MR. BISS: 22 Q Do you agree with the statement that 23 the Flynn's tweets do not establish that the 24 Flynn's are adherents to the QAnon credo? Do you 25 agree with that statement? That was my question.</p>

<p style="text-align: right;">Page 14</p> <p>1 MS. BOLGER: Objection. 2 Objection. Asked and answered. 3 THE WITNESS: No. 4 BY MR. BISS: 5 Q The next statement on Page 7 is the 6 next paragraph, and Judge Woods writes, 7 "Crucially, none of the Flynn's tweets state that 8 they are believers in the QAnon movement." 9 Do you agree with that? 10 MS. BOLGER: Object to the form. 11 THE WITNESS: I think the judge is 12 misunderstanding how people would pledge 13 allegiance to or indicate that they are 14 followers or sympathetic to the QAnon 15 movement. So, no, I do not agree with that 16 statement. 17 BY MR. BISS: 18 Q Turn to Page 8. I'm going to quote 19 from the third full paragraph, where Judge Woods 20 writes, "There are many reasons that someone 21 might retweet a statement. A retweet is not 22 necessarily an endorsement of the original tweet, 23 much less an endorsement of the unexpressed 24 belief system of the original tweeter." 25 MS. BOLGER: Sorry. Steve, I hate</p>	<p style="text-align: right;">Page 16</p> <p>1 system. Certainly the, you know, familiar 2 maxim at this point, retweets are not 3 endorsements, that's a common phrase on 4 Twitter. But you take it in the broader 5 context of what people are posting. So if 6 people are repeatedly retweeting or posting 7 or saying specific accounts, well, then 8 that's important context, so... 9 BY MR. BISS: 10 Q All right. What did you do to prepare 11 for the deposition today? 12 A I met with my counsel over a couple of 13 days. 14 Q Couple of days? 15 A Yes. 16 Q A full couple of days? 17 A No. A few hours. 18 Q A few hours each day? 19 A Yes. 20 Q How many hours each day? 21 A Probably in total, up to 10 or 11 22 hours. 23 Q Okay. Just one lawyer or more than 24 one lawyer? 25 A More than one.</p>
<p style="text-align: right;">Page 15</p> <p>1 to break your -- what page are we on? 2 MR. BISS: Page 8. The second 3 full paragraph. Looked like the third, but 4 it's the second full paragraph. 5 MS. BOLGER: I've got it. Sorry 6 for that. 7 BY MR. BISS: 8 Q Mr. O'Sullivan, I'm going to direct 9 you on Page 8, to the second full paragraph, 10 where Judge Woods writes, "There are many reasons 11 that someone might retweet a statement. A 12 retweet is not necessarily an endorsement of the 13 original tweet, much less an endorsement of the 14 unexpressed belief system of the original 15 tweeter." 16 Do you agree with that statement? 17 MS. BOLGER: Object to the form. 18 THE WITNESS: If we could break 19 that -- if you don't mind if I break that 20 sentence down into its parts, there are many 21 reasons that somebody might retweet a 22 statement, that is true. A retweet is not 23 necessarily an endorsement of the original 24 tweet; that can also be true. Much less an 25 endorsement of the unexpressed belief</p>	<p style="text-align: right;">Page 17</p> <p>1 Q How many? 2 A Three, four. 3 Q All three of the lawyers on the other 4 side of the counsel table? 5 A Yes. And one more. 6 Q And one more. 7 A Yeah. 8 Q Did you go over some documents? 9 A Yes. I went over the story. And I 10 was shown a few emails and things like that as 11 well. 12 Q If you see those emails today, will 13 you let me know? 14 A Yes. 15 Q Any other documents that you were 16 shown to prepare for the deposition? 17 A I think that's pretty much it, yeah. 18 We just reviewed the court documents and stuff as 19 well. 20 Q When you say you reviewed the court 21 documents, do you mean you reviewed -- 22 A Like the suits and the opinions or -- 23 MS. BOLGER: Let him finish. 24 THE WITNESS: Sorry. 25</p>

<p style="text-align: right;">Page 18</p> <p>1 BY MR. BISS:</p> <p>2 Q When you say "court documents" do you</p> <p>3 mean you reviewed the Flynn's Amended Complaint,</p> <p>4 CNN's response, the memorandum order, other</p> <p>5 pleadings in the case?</p> <p>6 A Yes. Things like that, yes.</p> <p>7 Q All right. Have you ever been sued</p> <p>8 before?</p> <p>9 MS. BOLGER: Object to the form.</p> <p>10 You can answer.</p> <p>11 THE WITNESS: No. There was a</p> <p>12 story that -- a story that got -- I think</p> <p>13 the case got kicked out. It was a story I</p> <p>14 was involved in that the person sued CNN,</p> <p>15 but it didn't go far.</p> <p>16 BY MR. BISS:</p> <p>17 Q Were you a named defendant in that</p> <p>18 case?</p> <p>19 A No.</p> <p>20 Q What was the style of that case?</p> <p>21 MS. BOLGER: Object to the form.</p> <p>22 THE WITNESS: The style?</p> <p>23 BY MR. BISS:</p> <p>24 Q Yeah. What was the name of the case?</p> <p>25 A Oh, it's a guy called George Webb.</p>	<p style="text-align: right;">Page 20</p> <p>1 BY MR. BISS:</p> <p>2 Q Okay. All right.</p> <p>3 Mr. O'Sullivan, let's take a look at</p> <p>4 Page 1, Paragraph 1. I want to quote from what</p> <p>5 the -- what's written in the Wall Street Journal.</p> <p>6 We're going to look at the Wall Street Journal</p> <p>7 independently, but the Wall Street -- Paragraph 1</p> <p>8 of the Amended Complaint indicates that the Wall</p> <p>9 Street Journal concludes that QAnon is a "far</p> <p>10 right wing, loosely organized network and</p> <p>11 community of believers who embrace a range of</p> <p>12 unsubstantiated beliefs."</p> <p>13 Do you agree with that statement?</p> <p>14 A I think that is mostly accurate, yes.</p> <p>15 Q What's inaccurate about it?</p> <p>16 A I don't know if all people who support</p> <p>17 QAnon would necessarily identify themselves as</p> <p>18 far right wing, but certainly a lot of them</p> <p>19 would. But I think, you know, that's -- it is --</p> <p>20 yes, its mostly accurate.</p> <p>21 Q The Wall Street Journal article goes</p> <p>22 on to state, "These views center on the idea that</p> <p>23 a cabal of Satan-worshipping pedophiles mainly</p> <p>24 consisting of what they see as elitist Democrats,</p> <p>25 politicians, journalists, entertainment moguls</p>
<p style="text-align: right;">Page 19</p> <p>1 Q George Webb, okay. Didn't go far,</p> <p>2 huh?</p> <p>3 A No, it didn't, no.</p> <p>4 Q All right. So I'd like you to take a</p> <p>5 look at what I've marked as Exhibit 2, sir. This</p> <p>6 is the Amended Complaint. I want to ask you some</p> <p>7 things about Paragraphs 1 and 2 only.</p> <p>8 A Okay.</p> <p>9 Q So I want to start on Page 1 of the</p> <p>10 complaint?</p> <p>11 MS. BOLGER: Object for one</p> <p>12 second. You can't instruct the witness that</p> <p>13 he can only respond to one portion of the</p> <p>14 document. The witness is entitled to see</p> <p>15 the whole document if he wants. He doesn't</p> <p>16 have to, but he's entitled to see the whole</p> <p>17 document if he wants.</p> <p>18 BY MR. BISS:</p> <p>19 Q Didn't you tell me that this is</p> <p>20 something you reviewed already yesterday to</p> <p>21 prepare for the deposition?</p> <p>22 MS. BOLGER: Object to the form.</p> <p>23 THE WITNESS: That I reviewed it</p> <p>24 yesterday, no.</p> <p>25</p>	<p style="text-align: right;">Page 21</p> <p>1 and other institutional figures have long</p> <p>2 controlled much of the so-called deep state</p> <p>3 government, which they say sought to undermine</p> <p>4 President Trump, mostly with aid of media and</p> <p>5 entertainment outlets."</p> <p>6 Do you agree with that statement?</p> <p>7 A Do we have a date on this Wall Street</p> <p>8 Journal article?</p> <p>9 Q It's February -- we're going to see</p> <p>10 it. It's February 4.</p> <p>11 A What year?</p> <p>12 Q 2021.</p> <p>13 A 2021? I would -- that is certainly a</p> <p>14 description of QAnon that, you know, I think for</p> <p>15 the most part sums up a lot of the beliefs, but,</p> <p>16 you know, I think if you were to have two</p> <p>17 self-professed QAnon followers in the room, they</p> <p>18 might not necessarily agree on everything, so</p> <p>19 that is part of the kind of the QAnon belief</p> <p>20 system, is you don't have to necessarily buy into</p> <p>21 everything. But a lot of this is true.</p> <p>22 Q I'm not interested in their views.</p> <p>23 I'm interested in your views.</p> <p>24 A That's my view, yeah.</p> <p>25 Q Would you agree with me that the</p>

<p style="text-align: right;">Page 22</p> <p>1 central view of QAnon is that a cabal of 2 Satan-worshipping pedophiles control the 3 government? 4 A I wouldn't, no. 5 Q You don't agree that that's a central 6 tenet of the QAnon belief system? 7 A No. 8 Q What are the -- what are the pillars 9 or tenets of the QAnon belief system? 10 A It's pretty fluid, I would say. 11 Q Give me your top ten. 12 A Sure. Well, one, I would say it 13 seemed to change and evolve over time. 14 Certainly, you know, I think there's a range and 15 a spectrum, right, of folks who follow QAnon. 16 There are certainly people I've encountered that, 17 you know, would adhere to a lot of what the Wall 18 Street Journal describes here. But then there's 19 a lot of people, too, who like QAnon but they 20 don't necessarily believe that there's a 21 Satan-worshipping cabal. They might be very 22 interested in QAnon because of its links to what 23 is said about the 2020 election and alleged 24 election fraud and things like that. So I think 25 it's a kind of wide Spectrum of beliefs?</p>	<p style="text-align: right;">Page 24</p> <p>1 faith, as it were. 2 BY MR. BISS: 3 Q You would agree that there are 4 identifiable tenets of or commandments, as you 5 put it, of the QAnon belief system that have been 6 articulated over the years by yourself and by 7 other -- by the Wall Street Journal and by 8 others? 9 MS. BOLGER: Object to the form. 10 Compound and other things. 11 BY MR. BISS: 12 Q You would agree that there is a belief 13 system that is composed of certain tenets? 14 A There is a set of beliefs, but I don't 15 think there's a -- you know, everybody has to 16 believe in X, Y and Z. I think actually a lot of 17 QAnon followers, supporters, would take issue 18 with this portrayal in the Wall Street Journal, 19 would take issue with the description by media. 20 They would say, "I don't believe that, I believe 21 something else. My focus is mostly about Trump 22 or mostly about Flynn." 23 Q Have you ever seen or do you have or 24 know of any evidence that Jack Flynn or Leslie 25 Flynn ever believed or adhered to the belief that</p>
<p style="text-align: right;">Page 23</p> <p>1 I think the commonality among QAnon 2 supporters or followers of Q or QAnon is the use 3 of the kind of memes and the slogans that are 4 associated with the movement. 5 Q Any other tenets of the QAnon belief 6 system? 7 MS. BOLGER: Objection to form. 8 BY MR. BISS: 9 Q Or the QAnon faith? 10 MS. BOLGER: Object to the form. 11 THE WITNESS: Trump is -- for a 12 lot of people Trump is the essential figure 13 in it. He's the hero-type figure, as is 14 General Michael Flynn is a figure in the 15 movement for some. There's a lot of unusual 16 beliefs that I'm still trying to wrap my 17 head around about John F. Kennedy and JFK, 18 Jr., that they're in some way involved and 19 perhaps not even dead. But again, it's a 20 range of beliefs. 21 As I say, I've been in the room 22 with QAnon supporters, so -- professed QAnon 23 supporters and, you know, there's not -- 24 there's not one core definition. There's 25 not a Ten Commandments as such in the QAnon</p>	<p style="text-align: right;">Page 25</p> <p>1 a cabal of Satan-worshipping pedophiles mainly 2 consisting of elitist Democrats, politicians, 3 journalists, entertainment moguls and other 4 institutional figures have long controlled much 5 of the so-called deep state government? Have you 6 ever seen any evidence that Jack and Leslie Flynn 7 subscribed or ascribed to that belief system? 8 A Firstly, I would say as it relates to 9 the report, my report, I didn't allege that 10 either Jack or Leslie were QAnon followers. They 11 took the QAnon oath in a video that was posted 12 publicly by General Michael Flynn. It was 13 retweeted by Jack Flynn. That's what I reported. 14 You know, in terms of Jack Flynn's 15 social media, there's certainly a lot of posts 16 there with QAnon iconography and slogans down 17 through the years. And similarly, Leslie also 18 appeared, of course, in the QAnon oath video on 19 July 4, 2020, and her similar social media 20 activity where she seemed to be liking posts 21 about QAnon on Twitter. 22 Q You didn't answer my question. 23 Have you ever seen any evidence that 24 Jack or Leslie Flynn subscribed or promoted the 25 belief that a cabal of Satan-worshipping</p>

<p style="text-align: right;">Page 26</p> <p>1 pedophiles have long controlled much of the 2 so-called deep state government? 3 MS. BOLGER: Object to the form. 4 Asked and answered. 5 THE WITNESS: I did not allege 6 that. 7 BY MR. BISS: 8 Q I didn't say you alleged it. 9 MS. BOLGER: Let him answer, 10 Steve. 11 MR. BISS: He's not answering my 12 question. 13 MS. BOLGER: Steve, you can't 14 interrupt the witness. 15 BY MR. BISS: 16 Q I want you to respond to my question. 17 If for some reason you can't, let me know that; 18 all right? 19 Here's my very specific question. 20 Okay. I want you to listen to my question. Do 21 you know of any evidence that Jack Flynn or 22 Leslie Flynn ever subscribed or ever promoted the 23 belief that a cabal of Satan-worshipping 24 pedophiles have long controlled much of the 25 so-called deep state government?</p>	<p style="text-align: right;">Page 28</p> <p>1 and this is -- yeah, you guys wrote this. 2 In terms of pointing to what -- as you 3 highlighted the Wall Street Journal article 4 and that characterization of QAnon, you 5 know, that is something that I don't 6 necessarily agree with all of the Wall 7 Street Journal's characterization here of 8 QAnon. But the QAnon movement is something 9 that Jack Flynn was posting about on social 10 media. 11 BY MR. BISS: 12 Q What about this specific belief? Did 13 Jack Flynn ever promote the specific belief that 14 a cabal of Satan-worshipping pedophiles have long 15 controlled much of the so-called deep state 16 government? 17 Have you ever seen any evidence that 18 Jack Flynn or Leslie Flynn ever promoted that 19 belief or ever believed that to be true? 20 MS. BOLGER: Object to the form. 21 Asked and answered. 22 I'll let you answer it one more 23 time. 24 THE WITNESS: Is this referred to 25 as the Amended Complaint?</p>
<p style="text-align: right;">Page 27</p> <p>1 MS. BOLGER: Object to the form. 2 THE WITNESS: I didn't allege 3 that. 4 BY MR. BISS: 5 Q I'm not saying you alleged it at all. 6 I want to know if you have any evidence that it's 7 true? 8 A I take issue with the premise of your 9 question. The premise being you are trying to 10 say all QAnon followers believe this thing about 11 Satan-worshipping pedophiles. I didn't call them 12 QAnon followers nor did I put it in this context 13 in that report. 14 Q Okay. So is your answer that you have 15 seen evidence that Jack Flynn, for instance, has 16 ever stated that he believes that a cabal of 17 Satan-worshipping pedophiles have controlled much 18 of the deep state government? 19 Have you ever seen any evidence that 20 Jack Flynn ever said that or that he ever 21 believed that to be true? 22 MS. BOLGER: Object to the form. 23 THE WITNESS: I've seen abundant 24 evidence that Jack Flynn has promoted Q 25 iconography and slogans on his social media,</p>	<p style="text-align: right;">Page 29</p> <p>1 BY MR. BISS: 2 Q Yes, it is the Amended Complaint. 3 A Exhibit 2, my report doesn't talk 4 about Satan-worshipping pedophiles. It's in the 5 Amended Complaint where you guys choose this 6 definition from the Wall Street Journal. My 7 report pointed out how they had taken the QAnon 8 pledge. And if you want to go with the 9 definition that you guys have chosen to outline 10 here in the Amended Complaint, certainly QAnon is 11 a movement, a group that the Flynn's were openly 12 flirting with. 13 Q I've done my best to try to get an 14 answer out of you. 15 MR. BISS: Will you mark that as 16 part of the transcript. 17 We'll go to court and compel you 18 to respond to that, Mr. O'Sullivan. 19 MS. BOLGER: Just for the record, 20 if that's what we're going to do, if we're 21 going to threaten the witness, then I'll 22 just say you asked the same question three 23 times and he gave the answer three times. 24 He may not have used the words you wanted, 25 but that's not not responding.</p>

<p style="text-align: right;">Page 30</p> <p>1 MR. BISS: He gave me no answer to 2 that at all. I've stated my position. 3 We're going to move on, 4 Mr. O'Sullivan, and hopefully you can answer 5 my next question; all right? 6 BY MR. BISS: 7 Q In Paragraph 2 of the Amended 8 Complaint there's reference to a January 31, 2021 9 CNN special report. Do you see that? 10 A Yes. 11 Q Hosted by Anderson Cooper, entitled 12 Inside the QAnon Conspiracy. 13 Do you see that? 14 A Yes. 15 Q Have you watched that special report? 16 A Yes. 17 Q And the statements that CNN and 18 Mr. Cooper made in that special report about 19 QAnon, do you agree with those statements? 20 MS. BOLGER: Object to the form. 21 That's way too vague. I'm not going to let 22 him answer a question about everything he's 23 never seen. You can show him the video or 24 show him the transcript and ask a question, 25 but you can't ask him to guess what CNN</p>	<p style="text-align: right;">Page 32</p> <p>1 that QAnon, like the Nazis, promoted ancient and 2 dark biases and bigotry in world history. CNN 3 stated that QAnon supporters were detached from 4 reality and had an utter disregard for the facts. 5 CNN alleged that QAnon followers were mentally 6 ill and crazy. CNN concluded that it was 7 abundantly clear that QAnon was a dangerous and 8 violent movement, a movement that has become 9 insurrectionist." 10 Do you agree with those statements 11 made by CNN in the special report? 12 MS. BOLGER: Object to the form. 13 THE WITNESS: I think part of -- 14 parts of it are accurate. I think in the 15 broader sense, you know, it's been two years 16 since I watched this documentary, I guess, 17 but, yeah, a lot of this is true. I didn't 18 write that report or that script. So I 19 don't have the context here for everything. 20 I would just make the broader 21 point about this being, if we break this 22 down, yes, a lot of this is -- I couldn't 23 take issue with what is here, but I would 24 make the broader point that, you know, my 25 reporting, and I think even the week this</p>
<p style="text-align: right;">Page 31</p> <p>1 said. 2 MR. BISS: Why are you interfering 3 with the deposition? He had testified he 4 had seen it. 5 MS. BOLGER: But he didn't say he 6 memorized it so that he can comment on its 7 truth. 8 MR. BISS: Why are you interfering 9 with the deposition? 10 MS. BOLGER: Do you have a 11 question? 12 MR. BISS: Yeah, I do. 13 MS. BOLGER: Go ahead. 14 BY MR. BISS: 15 Q Mr. O'Sullivan, do you agree with the 16 statements that CNN and Mr. Cooper made in the 17 special report, Inside the QAnon Conspiracy? 18 A What specific statements? Could you 19 point me to some? 20 Q Sure. If you can -- I'm going to read 21 the rest of Paragraph 2. 22 "CNN called QAnon a deranged 23 conspiracy cult. CNN stated that some of Q's 24 conspiracy claims were actually based on age-old 25 racist and anti-Semitic beliefs. CNN asserted</p>	<p style="text-align: right;">Page 33</p> <p>1 aired back in 2021, I think the lady I 2 interviewed was in this report, too, maybe. 3 I could be wrong about that. A lot of 4 people get kind of sucked into these rabbit 5 holes of misinformation, QAnon online, and 6 they're not violent, they're not 7 anti-Semitic, and they're not necessarily 8 mentally ill or crazy or go on and take part 9 in a dangerous and violent insurrection. I 10 think that a lot of people get sucked into 11 these things are victims. 12 But I still think, you know, the 13 broader umbrella of that is QAnon is 14 dangerous, absolutely. And particularly 15 because it, you know, pulls people into just 16 a very dark frame of mind, I think, which 17 could lead to violence or could, at least, 18 lead to one condoning violence. So I think 19 on the whole of what I see here, yes. I 20 think, yeah. 21 BY MR. BISS: 22 Q All right, sir -- 23 MS. BOLGER: He's not done. 24 Finish. 25 THE WITNESS: Yeah, I was just</p>

<p style="text-align: right;">Page 34</p> <p>1 going to say on the whole, you know, I think 2 this is true in the broad sense, because 3 obviously it's just a few lines from a 4 90-minute or hourlong documentary. I know 5 there's more context around it. 6 BY MR. BISS: 7 Q Anything else? 8 A No. 9 Q Okay. You agree that QAnon is a 10 deranged conspiracy cult? You agree with that; 11 correct? 12 A QAnon is wacky. There's definitely 13 absurd elements to it. "Deranged" I suppose is a 14 word some folks would use. I wouldn't 15 necessarily say deranged. A conspiracy, yes, 16 based on a cult. I think it certainly has some 17 characterizations of a cult, yeah. But I 18 wouldn't necessarily use these words. 19 Q Okay. Do you believe that QAnon is 20 based on age-old racist and anti-Semitic beliefs? 21 A Some of it certainly comes through, 22 yeah, but again, I would just point out that, you 23 know, a lot of the QAnon followers and former 24 QAnon followers that I have spoken to, you know, 25 don't hold those views.</p>	<p style="text-align: right;">Page 36</p> <p>1 time in the U.S., CNN being in the center of the 2 politics. It was kind of practice at that point 3 for CNN correspondents and others, when we're 4 going to basically any political events, to bring 5 security. Certainly any political events I was 6 going to at that point, I had security. 7 Q All right. How did -- just to follow 8 up on something you said earlier, how does JFK 9 and JFK, Jr. fit into the QAnon belief system? 10 What did QAnon believe JFK and JFK, Jr. were 11 going to do? 12 A I'm trying to figure that one out. 13 Depending on the followers you speak to, there's 14 a different set of beliefs on how JFK plays into 15 all of this. So based off my reporting and many 16 conversations -- more conversations than I 17 probably would have liked to have about this -- 18 some people believe that JFK, Jr. is not dead. 19 That he faked his own death to -- he thought he 20 was going to get assassinated and that, you know, 21 he came up with a plan with Trump to fake his 22 death and then save America. Others also believe 23 that JFK actually wasn't assassinated and others 24 believe there's a lineage with, you know, from 25 JFK, Trump through to our Lord Jesus Christ.</p>
<p style="text-align: right;">Page 35</p> <p>1 Q Do you believe that QAnon is a 2 dangerous and violent movement? 3 MS. BOLGER: Object to the form. 4 THE WITNESS: I think it certainly 5 has the potential to lead to violence, and 6 obviously we saw, you know, with my report 7 in question, we did see that from that QAnon 8 event that I attended, some of those people 9 went on to take part in the attack on the 10 Capitol January 6. I certainly think -- 11 yeah, I think in many aspects it has the -- 12 it is dangerous, and can be violent. But 13 again, I've also spoken to, you know, 14 housewives and moms who have found 15 themselves going down these rabbit holes and 16 they are not necessarily turning violent, 17 you know. 18 BY MR. BISS: 19 Q Of course, you took security with you 20 to the Q Con Live event; correct? 21 A Yes. 22 Q And you took security because you were 23 concerned for your safety? 24 A At that time, 2020, just before the 25 election, obviously a very politically charged</p>	<p style="text-align: right;">Page 37</p> <p>1 Q Did you ever hear Jack Flynn make any 2 of those statements or say that he believed any 3 of that stuff about JFK and JFK, Jr.? 4 A I saw Jack Flynn sharing a lot of 5 QAnon memes. 6 Q Did you ever see Jack Flynn make any 7 statements about JFK, Jr. or JFK along the lines 8 you just described? 9 MS. BOLGER: Steve, you 10 interrupted him. Please don't interrupt 11 him. 12 Go ahead, Donie. 13 THE WITNESS: I've seen Jack Flynn 14 and the Flynn's share lots of QAnon memes, 15 iconography, the slogans. I can't 16 specifically recall a Jack Flynn post 17 referencing JFK. I do know that Leslie 18 Flynn liked a QAnon adjacent post with a 19 picture of either JFK or JFK, Jr. 20 BY MR. BISS: 21 Q How do you know that? 22 A Because I saw it on her Twitter feed. 23 Her public Twitter feed. 24 Q When? 25 A Over the course of this -- in the</p>

<p style="text-align: right;">Page 38</p> <p>1 course of this legal process.</p> <p>2 Q So after the lawsuit had been filed?</p> <p>3 A Correct. But I would point out that I</p> <p>4 was aware at the time of the story of the general</p> <p>5 social media posts from the Flynnns which were</p> <p>6 flirting or indicating a signal to QAnon and</p> <p>7 QAnon followers, and, of course, I was very aware</p> <p>8 that Jack, Leslie and the other Flynnns had</p> <p>9 appeared in a video oath to QAnon that was posted</p> <p>10 publicly on social media.</p> <p>11 Q You're not testifying under oath that</p> <p>12 you saw Leslie Flynnn's tweet about JFK before</p> <p>13 this lawsuit was filed?</p> <p>14 MS. BOLGER: Object to the form.</p> <p>15 THE WITNESS: Not prior to</p> <p>16 publication, no.</p> <p>17 (Exhibit 3 was marked.)</p> <p>18 BY MR. BISS:</p> <p>19 Q All right, Mr. O'Sullivan, I'm handing</p> <p>20 you a document I've marked as Exhibit 3. And</p> <p>21 this is a document that I cut and pasted from the</p> <p>22 internet. It's your bio with the link cited down</p> <p>23 at the bottom. My question is you're aware that</p> <p>24 there's a bio for you on the website of CNN;</p> <p>25 correct?</p>	<p style="text-align: right;">Page 40</p> <p>1 published on CNN's website; correct?</p> <p>2 A I was involved in it, yes.</p> <p>3 Q Have you ever made any effort to</p> <p>4 correct CNN?</p> <p>5 MS. BOLGER: Object to the form.</p> <p>6 BY MR. BISS:</p> <p>7 Q Or have you ever told anybody, "Hey,</p> <p>8 this bio contains inaccuracies"?</p> <p>9 A Not that I can recall.</p> <p>10 Q Have you ever afforded CNN the</p> <p>11 opportunity to correct any misinformation in your</p> <p>12 biography on its website?</p> <p>13 A Not that I can recall.</p> <p>14 Q Okay, so it's true that you're a top</p> <p>15 expert in your field; correct?</p> <p>16 A I think that's very kind. As</p> <p>17 somebody -- you know, somebody raised with Irish</p> <p>18 Catholic parents taught me to be humble. Top</p> <p>19 expert is not something that I would go about</p> <p>20 bandying about myself, but I suppose when it</p> <p>21 comes to online misinformation and the role it</p> <p>22 plays in American politics, yes, that's accurate.</p> <p>23 Q The next line here says, "In the</p> <p>24 months leading up to the 2020 U.S. presidential</p> <p>25 election, he," referring to you, "traveled the</p>
<p style="text-align: right;">Page 39</p> <p>1 A Yes.</p> <p>2 Q And did you take any part in preparing</p> <p>3 that bio?</p> <p>4 A To my recollection, I think I was</p> <p>5 consulted on it.</p> <p>6 Q Without going through the entire</p> <p>7 document, are the statements that -- in the</p> <p>8 biography published on CNN's website about you,</p> <p>9 are they truthful and accurate?</p> <p>10 MS. BOLGER: Objection to form.</p> <p>11 You should read it before you</p> <p>12 answer the question, so do go through the</p> <p>13 whole document.</p> <p>14 THE WITNESS: Yes, accurate.</p> <p>15 BY MR. BISS:</p> <p>16 Q All right. So you write in here,</p> <p>17 quote, "O Sullivan is a top expert in his field,</p> <p>18 whose work primarily focuses on the real world</p> <p>19 effects of online misinformation and the role it</p> <p>20 plays in American politics."</p> <p>21 Do you see that?</p> <p>22 A I see that, yeah. You said I wrote</p> <p>23 it, but I didn't write it, to the best of my</p> <p>24 recollection.</p> <p>25 Q All right. You authorized it to be</p>	<p style="text-align: right;">Page 41</p> <p>1 country reporting on the role conspiracy theories</p> <p>2 were playing in voters' attitude to the election</p> <p>3 and to the country's response to the COVID-19</p> <p>4 pandemic."</p> <p>5 Do you see that?</p> <p>6 A Yes.</p> <p>7 Q Is that accurate?</p> <p>8 A Yes.</p> <p>9 Q All right. And what conspiracy</p> <p>10 theories?</p> <p>11 A So I had been reporting on online</p> <p>12 misinformation and from behind the computer</p> <p>13 screen for a long time. In 2020, you know, we</p> <p>14 saw so much misinformation about the election and</p> <p>15 about COVID, I wanted to kind of get into the</p> <p>16 country and start talking to people about what</p> <p>17 they were seeing online and how it was affecting</p> <p>18 their views on politics and whatnot. Yeah, in</p> <p>19 the months leading up to the 2020 election there</p> <p>20 was a lot about -- conspiracy theories about the</p> <p>21 upcoming election, that it was going to be</p> <p>22 rigged, that if Trump didn't win, the only way he</p> <p>23 couldn't win is that it would be rigged. And --</p> <p>24 yeah.</p> <p>25 Q All right. Other than the Q Con Live</p>

<p style="text-align: right;">Page 42</p> <p>1 event, what other events did you attend or where 2 did you travel in the country to? What did you 3 do to report on these conspiracy theories? 4 MS. BOLGER: Object to the form. 5 THE WITNESS: A lot of Trump 6 rallies. Bemidji, Minnesota. And I went to 7 what was called, I think, a Save the 8 Children event, which had nothing to do with 9 the -- or Save Our Children event. It was a 10 QAnon-adjacent event in Los Angeles, where 11 people were repeating some of the conspiracy 12 theories you referenced earlier about a 13 cabal of pedophiles and whatnot. And I'm 14 trying to think what else. I was definitely 15 at lots of other events, but that's what I 16 recall right now. 17 BY MR. BISS: 18 Q All right, sir. Put that to the side. 19 (Exhibit 4 was marked.) 20 Mr. O'Sullivan, I'm handing you a 21 document that I have marked as Exhibit 4. This 22 is a copy of your Twitter profile; correct? 23 A Yes. 24 Q How long have you -- have you been a 25 member of Twitter since December of 2010?</p>	<p style="text-align: right;">Page 44</p> <p>1 Q How about Mr. Stelter? He's ex-CNN. 2 A He follows me. Last time I checked, 3 yeah. 4 Q Do you know how Twitter works? 5 MS. BOLGER: Object to the form. 6 You can answer if you can. 7 THE WITNESS: In what way? 8 BY MR. BISS: 9 Q In the sense of when you publish a 10 tweet, do you know what happens to that tweet? 11 Whose Twitter accounts it goes to? Do you know 12 how Twitter -- 13 MS. BOLGER: Object to the form. 14 THE WITNESS: I mean, you 15 wouldn't -- you publish it and your 16 followers can see it. But also, of course, 17 I have a public account, so other people 18 could access it who are not my followers. 19 BY MR. BISS: 20 Q So when you publish a tweet, that goes 21 to Mr. Darcy and Mr. Stelter and all your other 22 followers; you agree with that? 23 MS. BOLGER: Object to the form. 24 THE WITNESS: They might see it in 25 their feed if they're on Twitter at that</p>
<p style="text-align: right;">Page 43</p> <p>1 A That's what it says there, and I think 2 that's accurate, yes. 3 Q And you currently have about 298,000 4 followers? 5 A Yes. 6 Q Do you remember how many followers you 7 had back in February of 2021? 8 A I couldn't say exactly, but it's 9 probably in the 200 to 250 range maybe. 10 Q Do you remember how many followers you 11 had on June 15, 2021? 12 A Not specifically. 13 Q Do you generally have a general 14 working knowledge of who your followers are? 15 MS. BOLGER: Object to the form. 16 THE WITNESS: No. 17 BY MR. BISS: 18 Q Do you ever go in and click on the 19 followers tab and look at who's following you? 20 A I mean, I'm aware of some people who 21 follow me, but not everybody. 22 Q How many CNN employees follow you? 23 A I don't know. 24 Q Mr. Darcy? 25 A He does.</p>	<p style="text-align: right;">Page 45</p> <p>1 time, I suppose, but it's impossible to say 2 for every individual tweet, you know. But 3 they would certainly have access to it, of 4 course. 5 BY MR. BISS: 6 Q This Twitter account @Donie, 7 D-O-N-I-E, this is your -- the Twitter account 8 that you use for business purposes for CNN; 9 correct? 10 A I tweet my stories there and I also 11 tweet bad jokes. 12 Q Some of them are particularly bad 13 jokes. Nonetheless -- 14 A I've been reading your entries. 15 Q Your profile says -- has your office 16 or your work email address; correct? 17 A Yeah. 18 Q And it identifies you as a CNN 19 correspondent. Is that an accurate description 20 of your duties and responsibilities? 21 A Yes. 22 Q And then the Signal number there, is 23 that a Signal account that you use to conduct 24 business of CNN? 25 A That is basically like -- it's not my</p>

<p style="text-align: right;">Page 46</p> <p>1 main number. It's just a number I use for Signal 2 that I post publicly, which I think I added that 3 in the last year or so. But it's for if people 4 want to send me tips through that number, or they 5 can email. 6 Q And you don't use that Signal account 7 for personal purposes? 8 A No. 9 Q Just for CNN business purposes? 10 A Yes. For basically if people want to 11 send tips. 12 Q All right. Do you live in New York 13 City? 14 A I do, yeah. 15 Q Do you have an office -- do you work 16 in New York City -- out of New York City? 17 A Yeah, that's a base office here, yeah. 18 Q Do you have an office that you go to? 19 A In the CNN building, yeah. 20 Q Fair enough. What's the address of 21 the CNN building? 22 A It is 30 Hudson Yards. 23 Q Describe for me in your business who 24 your supervisor or supervisors are, if you have 25 them.</p>	<p style="text-align: right;">Page 48</p> <p>1 two R's, titled What Is QAnon? What We Know 2 about the Conspiracy Theory Group. 3 Have you ever seen this article before 4 today? 5 A I don't think so. 6 Q When you first saw a reference to the 7 article in the Flynn's Amended Complaint, did you 8 go read it? 9 A No. 10 Q All right. I want to ask you some 11 questions about some of the statements that 12 Mr. Forrest has made in here, and my question is 13 going to be the same with regard to most all of 14 these. That is whether you agree with the 15 statements. If you don't agree, I'm interested 16 in knowing why you don't agree with them. 17 So the first one on Page 1 is one we 18 talked about that's quoted in the Flynn's Amended 19 Complaint, and that is that the views of QAnon 20 center on the idea that a cabal of 21 Satan-worshiping pedophiles have long controlled 22 much of the so-called deep state government. 23 Do you agree with that statement? 24 MS. BOLGER: I'm just going to 25 object to using an exhibit that the witness</p>
<p style="text-align: right;">Page 47</p> <p>1 A Do you want to know now or at the time 2 of the story? 3 Q That's a good qualification. Let's 4 talk -- unless I say otherwise, let's talk about 5 at the time of the story. 6 A At the time of the story. So at that 7 point -- I work with numerous people because I 8 kind of work across a few different teams. 9 Sometimes I do stories that are articles for 10 digital, sometimes stories for TV, sometimes for 11 both. So depending on the kind of platform it 12 will live, that can dictate who I work with on 13 specific stories. 14 But at that time, my editor was Alex 15 Koppelman. So kind of my text written pieces. 16 And then for the -- for this particular TV piece, 17 I worked with an executive producer and a 18 producer on the show where this first aired, 19 which was CNN Tonight. And, yeah, that would 20 have been about it. 21 Q Okay. Put that to the side. 22 (Exhibit 5 was marked.) 23 I'm handing you a document that I've 24 marked as Exhibit 5. This is a copy of the Wall 25 Street Journal article written by Brett Forrest</p>	<p style="text-align: right;">Page 49</p> <p>1 has said he has not seen, and if he wants -- 2 if he wants to, he has the chance to read 3 the whole article. 4 Otherwise you can answer the 5 question. 6 MR. BISS: You can do all that on 7 redirect if you want. 8 MS. BOLGER: No, actually, the 9 rules are he's entitled to look at the 10 exhibits you put in front of him. 11 BY MR. BISS: 12 Q Mr. O'Sullivan, if you want to take a 13 look at the whole document, we can do that so we 14 can dispense with this. 15 A I'm happy for now to go through it. 16 MR. BISS: I don't find anybody 17 really wants to waste the time to do that. 18 I find it somewhat outrageous that you would 19 think he had to have reviewed this document 20 to answer simple a question. 21 MS. BOLGER: That is the rules. 22 BY MR. BISS: 23 Q Do you agree with the views expressed 24 by Mr. Forrest that I just read? 25 A I think as I kind of mentioned</p>

<p style="text-align: right;">Page 50</p> <p>1 earlier, that's certainly something that some 2 QAnon believers might believe, but not all. 3 Q All right, sir. Turn to the second 4 page. There's a sentence at the top that says, 5 "QAnon followers are awaiting two major events: 6 The Storm and The Great Awakening." 7 Do you see that? 8 A Uh-huh. 9 Q Have you ever seen any evidence that 10 suggests that Jack Flynn or Leslie Flynn were 11 ever awaiting these two major events? 12 MS. BOLGER: Objection to form. 13 THE WITNESS: I've seen plenty of 14 evidence, including them taking a QAnon 15 oath, that they were engaging in or flirting 16 with QAnon. You know, I can't speak to 17 what's in their heart about their -- you 18 know, this, but in terms of, you know, you 19 bring this line up, "QAnon followers are 20 awaiting two major events: The Storm and 21 The Great Awakening," again, my answer on -- 22 my response to this Wall Street Journal 23 characterization is that, yes, many QAnon 24 supporters, followers, you know, believe in 25 this. But not necessarily everybody.</p>	<p style="text-align: right;">Page 52</p> <p>1 BY MR. BISS: 2 Q It's a big word. I have trouble 3 saying it. Have you ever seen Jack Flynn or 4 Leslie Flynn share any memes or iconography that 5 references The Storm? 6 A For a lot of QAnon supporters, seeing 7 Jack or Leslie Flynn engage in or share slogans 8 like "Where We Go One We Go All," they would view 9 that as a signal -- they could view that as a 10 signal to The Storm, The Great Awakening. 11 So, you know, I think you can try and 12 divide up QAnon into these parts, as this Wall 13 Street Journal article attempts to do, but, you 14 know, as I said, QAnon followers, supporters, 15 there's not an agreement on everything that they 16 believe in. 17 Q Would you agree with me that The Storm 18 and The Great Awakening are two tenets of the 19 QAnon belief system? 20 MS. BOLGER: Object to the form. 21 THE WITNESS: No. 22 BY MR. BISS: 23 Q Okay. A few lines below it says, 24 "Followers believe that Q is a high-ranking 25 government insider, presumably with a military or</p>
<p style="text-align: right;">Page 51</p> <p>1 BY MR. BISS: 2 Q How about Jack Flynn and Leslie Flynn? 3 MS. BOLGER: Object to form, asked 4 and answered. 5 BY MR. BISS: 6 Q Have you ever seen any evidence that 7 they believe these two major events are going to 8 occur? 9 A Seen evidence of them engaging in 10 QAnon iconography and slogans. 11 Q I want you to -- if you can, I want 12 you to focus on The Storm and The Great 13 Awakening. I want you to keep those two events 14 right in the front of -- right here, front of 15 your cerebral core text or whatever it's called. 16 Have you ever seen any evidence that 17 Jack or Leslie Flynn are awaiting these two major 18 events? 19 A I've seen them share and engage in 20 QAnon iconography and slogans. 21 Q How about The Storm; have you ever 22 seen them share any -- what did you say, 23 iconography? 24 A Yeah. Is that a correct word? 25 MS. BOLGER: Objection.</p>	<p style="text-align: right;">Page 53</p> <p>1 intelligence background, committed to exposing 2 the hidden truth," and it goes on. 3 Do you see that? 4 A Yes. 5 Q Have you ever seen a document in which 6 Jack Flynn or Leslie Flynn has ever expressed the 7 belief that Q is a high-ranking government 8 insider? 9 A I have seen the Flynnns take the QAnon 10 pledge. I've seen Jack Flynn share a post from 11 the persona Q, who is behind QAnon. And, yes, I 12 mean, a general tenet -- I guess a general tenet 13 is when it comes to Q, that I would say 14 definitely a majority of people who are engaging 15 in the world of QAnon definitely believe that Q 16 is somebody who is -- has some kind of insight -- 17 insider intelligence. 18 Q Would you agree with me that one of 19 the tenets of the QAnon belief system is that Q 20 is a high-ranking government insider? 21 MS. BOLGER: Object to the form. 22 THE WITNESS: Again, tenet -- I 23 would say a good if not a majority of QAnon 24 followers or believers believe that's 25 somebody with definite insider intelligence</p>

<p style="text-align: right;">Page 54</p> <p>1 or insider information. Yeah, a lot of them</p> <p>2 agree it's a high-ranking insider. But some</p> <p>3 people speculate it's multiple people. So</p> <p>4 it's a very fluid set of beliefs.</p> <p>5 BY MR. BISS:</p> <p>6 Q Do you know who Sidney Powell is?</p> <p>7 A I do.</p> <p>8 Q And have you ever heard of the phrase</p> <p>9 "Release the Kraken"?</p> <p>10 A I have.</p> <p>11 Q Is that a QAnon phrase?</p> <p>12 MS. BOLGER: Object to the form.</p> <p>13 THE WITNESS: I couldn't say.</p> <p>14 BY MR. BISS:</p> <p>15 Q What about if I put a hashtag in front</p> <p>16 of it?</p> <p>17 MS. BOLGER: Object to form.</p> <p>18 THE WITNESS: I haven't reported</p> <p>19 on that.</p> <p>20 BY MR. BISS:</p> <p>21 Q What's the purpose of a hashtag?</p> <p>22 A What is the purpose of a hashtag?</p> <p>23 Q Yeah. What do you get when you put a</p> <p>24 hashtag, Release the Kraken, the phrase "Release</p> <p>25 the Kraken"?</p>	<p style="text-align: right;">Page 56</p> <p>1 MS. BOLGER: Object to the form.</p> <p>2 BY MR. BISS:</p> <p>3 Q I'm looking for your understanding.</p> <p>4 A Yeah. I mean, I didn't report much on</p> <p>5 it at the time, so to my recollection, it was --</p> <p>6 I think she was suggesting that she would have</p> <p>7 evidence of mass voter fraud that could</p> <p>8 potentially overturn the results of the 2020</p> <p>9 election. I think that's what the Kraken in this</p> <p>10 case was referring to.</p> <p>11 MS. BOLGER: Steve, can I ask a</p> <p>12 question?</p> <p>13 Are you recording? You have a</p> <p>14 thing around your neck.</p> <p>15 MR. FLYNN: No, no.</p> <p>16 MS. BOLGER: You're listening to</p> <p>17 music? No, I'm kidding. Thank you for</p> <p>18 answering me.</p> <p>19 MR. FLYNN: Thanks for asking. I</p> <p>20 moved your wire because I didn't want the</p> <p>21 documents to get hung up.</p> <p>22 MS. BOLGER: Thank you.</p> <p>23 BY MR. BISS:</p> <p>24 Q Mr. O'Sullivan, if you turn to the</p> <p>25 next page of the Wall Street Journal article, it</p>
<p style="text-align: right;">Page 55</p> <p>1 A To answer your first question, what's</p> <p>2 the purpose of the hashtag, lots of times it's to</p> <p>3 show solidarity, like hashtag Me Too or hashtag</p> <p>4 MAGA or hashtag Trump 2024. And it's a way, I</p> <p>5 guess, in practice on Twitter or other social</p> <p>6 media platforms where you can click the hashtag</p> <p>7 and you can see all the other people who are</p> <p>8 sharing it and having a conversation around that.</p> <p>9 MS. BOLGER: Steve, we've been</p> <p>10 going about an hour, so when you're done</p> <p>11 with this document I would love to take</p> <p>12 break.</p> <p>13 MR. BISS: We can take one now.</p> <p>14 I'm not done with the document. It might</p> <p>15 take more than five minutes.</p> <p>16 (Whereupon there was a brief</p> <p>17 recess from 11:31 a.m. until 11:42 a.m.)</p> <p>18 BY MR. BISS:</p> <p>19 Q Mr. O'Sullivan, we're back on the</p> <p>20 record after a short break and I wanted to follow</p> <p>21 up on the "Release the Kraken" phrase. What</p> <p>22 was -- what's your understanding of Sidney</p> <p>23 Powell's use of that phrase? What was it</p> <p>24 referring to? What was the meaning of the</p> <p>25 phrase?</p>	<p style="text-align: right;">Page 57</p> <p>1 says, "QAnon supporters adopted the phrase as a</p> <p>2 rallying cry."</p> <p>3 A Is this Page 2? Sorry. The second</p> <p>4 page?</p> <p>5 Q Third page of the article. The very</p> <p>6 top it says, "QAnon supporters adopted the phrase</p> <p>7 as a rallying cry."</p> <p>8 Do you agree with that?</p> <p>9 A It's my recollection I know a lot of</p> <p>10 QAnon folks, QAnon forums and things. They</p> <p>11 certainly love that slogan. I don't think I ever</p> <p>12 reported it as a rallying cry.</p> <p>13 Q Do you believe that Release the Kraken</p> <p>14 is a rallying cry of QAnon supporters?</p> <p>15 A Based on the reporting that I've done</p> <p>16 on it, which has been slim, I don't feel -- I</p> <p>17 certainly know it was in the forums. So that's</p> <p>18 kind of all I know about it, that it would have</p> <p>19 been in the forums. I'm not sure about the</p> <p>20 characterization of the Wall Street Journal.</p> <p>21 Q Have you ever seen any evidence that</p> <p>22 Jack or Leslie Flynn has ever used the phrase</p> <p>23 "Release the Kraken"?</p> <p>24 A Not that -- I mean I can't say for</p> <p>25 certain. I can't say for certain, no.</p>

<p style="text-align: right;">Page 58</p> <p>1 Q The next paragraph on the third page 2 of the Wall Street Journal article refers to 3 QAnon apparel; do you see that? 4 A The next page, is it? 5 Q The same -- third page. Same page. 6 Just below "rallying cry" there's a quote, "QAnon 7 apparel." 8 A Yeah. Yeah. 9 Q Do you believe that a QAnon follower 10 is a person who, among other things, wears QAnon 11 apparel? 12 MS. BOLGER: Object to the form. 13 THE WITNESS: I think that for 14 some people who follow QAnon or like QAnon, 15 that they would wear QAnon apparel, yeah. 16 That could be somebody wearing the big Q on 17 their top or of course the Where We Go One 18 We Go All QAnon slogan. 19 BY MR. BISS: 20 Q What do you believe constitutes QAnon 21 apparel other than a shirt with a Q on it? 22 A In the context, of course. 23 Q A shirt with ""Where We Go One We Go 24 All" on it? 25 A Yeah.</p>	<p style="text-align: right;">Page 60</p> <p>1 University College Dublin in Ireland and I did a 2 postgraduate in Queen's University Belfast. 3 Q Did they have like a university store 4 where you could go buy University of Dublin or 5 Queen's University apparel? 6 A They would have, yeah. 7 Q The Queen's University, was that a Q? 8 A QUB was their slogan, yeah. 9 Q How about Dublin, was that a D or how 10 did their shirts look? 11 A UCD. 12 Q I went to Princeton, and shirts all 13 had a big P on it. Did you ever see one of those 14 Princeton shirts with a P on it? 15 A I haven't. I don't keep such great 16 company, Steve. 17 Q I have to tell you, I wouldn't be 18 caught dead in it. I wouldn't be caught dead 19 wearing Princeton apparel. 20 A Why not? 21 Q Just because of the way the university 22 has become. I don't agree with any of its tenets 23 or beliefs. 24 Do you think that some people wear 25 QAnon apparel just because they think the shirt's</p>
<p style="text-align: right;">Page 59</p> <p>1 Q What other types of apparel would be 2 QAnon apparel, as far as you're concerned? 3 A They're the main two, just because 4 Where We Go One We Go All I think is the most 5 overt slogan, but I would have seen at QAnon 6 events and things like that people wearing, you 7 know, shirts and things that say The Storm Is 8 Coming or The Great Awakening or that kind of 9 thing as well. 10 Q How about hats? 11 A Sure. 12 Q QAnon hats? 13 A Sure. 14 Q Okay. Anything else? Have you ever 15 seen any other -- socks? Have you seen QAnon 16 socks? 17 A I'm sure they have everything. I was 18 at a Trump rally back in maybe October of 2020, 19 the vendors outside the event, there had been an 20 ex explosion for demand of QAnon type 21 merchandise. They said they couldn't sell it 22 quick enough. 23 Q I forgot to ask you, where did you go 24 to university or college? 25 A I went to -- did my undergraduate</p>	<p style="text-align: right;">Page 61</p> <p>1 cool? 2 MS. BOLGER: Object to the form. 3 THE WITNESS: I don't know. 4 BY MR. BISS: 5 Q Do you think there might be -- other 6 than to indicate that they may be a QAnon 7 follower or an adherent to the QAnon belief 8 system, do you think there might be other reasons 9 for people to purchase a QAnon T-shirt or a QAnon 10 hat? 11 MS. BOLGER: Object to the form. 12 THE WITNESS: I don't know. 13 BY MR. BISS: 14 Q Have you ever seen any photos or any 15 other evidence that Jack Flynn ever wore any item 16 of QAnon apparel? 17 A I don't believe I've seen Jack Flynn 18 in QAnon apparel, but I've seen him share a lot 19 of QAnon slogans and take the QAnon oath. 20 Q How about Leslie Flynn; did you ever 21 see her in a QAnon -- 22 A I don't think so. 23 Q -- shirt or hat or maybe a nice pair 24 of QAnon socks? 25 A I don't think so.</p>

<p style="text-align: right;">Page 62</p> <p>1 Q How about Valerie Flynn or Lori Flynn; 2 have you ever seen them in any QAnon apparel? 3 A I don't think so, although I know at 4 the time in 2020, the Flynnns were selling QAnon 5 merchandise through their -- the online store. I 6 think they were selling Where We Go One We Go All 7 merchandise. 8 Q What led you to that conclusion, that 9 the Flynnns were selling it? 10 A It was through the Flynn Defense Fund 11 or whatever the correct terminology is, but yeah, 12 that was just something that was known. 13 Q You thought the Flynnns were selling 14 those T-shirts? 15 A It was being sold in conjunction -- it 16 was being sold on a website that was linked to 17 the Flynnns. 18 Q Linked to the Flynnns? 19 A Yes. 20 Q How was it linked to Jack Flynn? 21 A I can only tell you what I know. 22 Q Okay. 23 A Which is -- and also through this 24 discovery process, I also saw an email from Lori 25 Flynn in December 2020 where she wrote about how</p>	<p style="text-align: right;">Page 64</p> <p>1 himself, although he denies that. 2 Q Do you know whether or not Jack Flynn 3 or Leslie Flynn have ever had any communications 4 of any kind with Ron Watkins or his father, Jim 5 Watkins? 6 A I don't know. 7 Q Turn to the next page. There is an 8 individual who is -- has his mouth open as if 9 he's about to -- maybe throw some of those 10 Swedish fish into his mouth or something. He's 11 wearing a headdress with some horns and he's 12 tattooed. He appears to be in the Capitol. He 13 is referred to as the QAnon Shaman. Do you see 14 this individual? 15 A I do. 16 MS. BOLGER: Objection. I don't 17 see him referred to as a QAnon Shaman, but 18 everything else you said was right. 19 MR. BISS: Fair enough. 20 BY MR. BISS: 21 Q So that guy is colloquially known as 22 the QAnon Shaman; correct? 23 A That's correct. 24 Q And his name is Jacob Anthony 25 Chansley, or Jake Angeli if you prefer that.</p>
<p style="text-align: right;">Page 63</p> <p>1 I think the online store, the eCommerce platform, 2 I think they had a ban on selling QAnon 3 merchandise, and I think whatever that 4 Flynn-adjacent store was had to take down Where 5 We Go One We Go All slogan. 6 Q Okay. Who is Ron Watkins? 7 A Ron Watkins is -- he is the son of Jim 8 Watkins, who is the guy who set up a platform 9 called 8chan, which I think later became 8kun, 10 and that website is where the person -- persona, 11 whatever you want to call it, Q, posts their 12 so-called Q drops. And Ron Watkins also was 13 engaging in, you know, sharing a lot of 14 allegations about the 2020 election and voting 15 machines and whatnot on social media. 16 Q This Wall Street journal says that Ron 17 Watkins is a prominent QAnon supporter. Do you 18 agree with that? 19 A I would say he is a prominent figure 20 in the QAnon movement, given his association with 21 the website which is the home of Q. 22 There was also an HBO documentary that 23 focused on QAnon, and that documentary alleged in 24 some way that Ron Watkins might have been 25 actually involved in running the Q persona</p>	<p style="text-align: right;">Page 65</p> <p>1 You're familiar with who that person 2 is; right? 3 A Yes. 4 Q The wall Street Journal identifies him 5 as a QAnon adherent. Do you agree with that? 6 MS. BOLGER: Object to the form. 7 THE WITNESS: I think he would -- 8 I think the QAnon Shaman would probably 9 agree with that. I didn't have the 10 opportunity to ask him, but I saw him at one 11 QAnon event. Of course, he does style 12 himself as the QAnon Shaman. So I think it 13 would be fair to say that he is a fan of 14 QAnon. 15 BY MR. BISS: 16 Q And he often carried a battered sign 17 reading Q Sent Me? 18 A Yes. 19 Q Do you know whether Jack Flynn or 20 Leslie Flynn have ever had any communications of 21 any kind with the QAnon Shaman? 22 A I don't know. 23 Q Do you know whether or not Valerie, 24 Lori Flynn have any communications of any kind 25 with the QAnon Shaman?</p>

<p style="text-align: right;">Page 66</p> <p>1 A I don't know.</p> <p>2 Q Do you know whether General Flynn has</p> <p>3 ever had any communications with the QAnon</p> <p>4 Shaman, Ron Watkins or Jim Watkins?</p> <p>5 A I don't know.</p> <p>6 Q If you turn to the next page, it talks</p> <p>7 about "Where and how did QAnon start?"</p> <p>8 Do you see that at the bottom of the</p> <p>9 page?</p> <p>10 A Yes.</p> <p>11 Q There's a reference there to Q drops.</p> <p>12 You've referenced something called Q drops.</p> <p>13 A Yeah.</p> <p>14 Q What is your understanding of what Q</p> <p>15 drops are?</p> <p>16 A They're the posts that the persona Q</p> <p>17 publishes on the 8chan/8kun platforms. They are</p> <p>18 understood to be by, you know, many supporters,</p> <p>19 followers of this movement, to be, you know,</p> <p>20 these coded messages from the so-called Q</p> <p>21 persona. And I think there's a few thousand</p> <p>22 drops.</p> <p>23 Q Are they also known as bread crumbs?</p> <p>24 MS. BOLGER: Object to the form.</p> <p>25 THE WITNESS: I think so.</p>	<p style="text-align: right;">Page 68</p> <p>1 for nuclear weapons? Who figured that out?</p> <p>2 MS. BOLGER: Object to form.</p> <p>3 If you know.</p> <p>4 THE WITNESS: I don't know.</p> <p>5 BY MR. BISS:</p> <p>6 Q Have you ever seen any evidence that</p> <p>7 would suggest that General Flynn is Q or the Q</p> <p>8 clearance patriot?</p> <p>9 A That is something that I think some</p> <p>10 QAnon followers believe.</p> <p>11 Q How about you?</p> <p>12 A Or wish for or hope for. I have not</p> <p>13 seen evidence of him saying, "I am this person."</p> <p>14 But obviously I have seen a lot of signaling to</p> <p>15 the QAnon movement, including taking the QAnon</p> <p>16 oath on July 4, 2020.</p> <p>17 Q Have you ever seen any evidence that</p> <p>18 General Flynn is Q or the founder of QAnon?</p> <p>19 MS. BOLGER: Object to the form.</p> <p>20 THE WITNESS: I have not. Just</p> <p>21 only seen the evidence in public posts of,</p> <p>22 you know, the public flirtation with this</p> <p>23 conspiracy theory movement. I think that,</p> <p>24 you know, it was notable and why many</p> <p>25 outlets in the U.S. and around the world</p>
<p style="text-align: right;">Page 67</p> <p>1 BY MR. BISS:</p> <p>2 Q What's the basis of your belief</p> <p>3 that -- or your suspicion that Q drops are also</p> <p>4 known as bread crumbs?</p> <p>5 A I think I've heard that be used</p> <p>6 colloquially. I don't think I've used it in my</p> <p>7 reporting, but that sounds right to me.</p> <p>8 Q This article by the Wall Street</p> <p>9 Journal represents that the first Q drop was in</p> <p>10 October of 017. Is that -- do you agree with</p> <p>11 that statement?</p> <p>12 MS. BOLGER: Object to the form.</p> <p>13 THE WITNESS: To the best of my</p> <p>14 recollection, yes.</p> <p>15 BY MR. BISS:</p> <p>16 Q And it was posted on the 4chan website</p> <p>17 by someone or some number of people identified</p> <p>18 as, quote, "Q clearance Patriot"; do you see</p> <p>19 that?</p> <p>20 A Uh-huh.</p> <p>21 Q Do you agree with that?</p> <p>22 A To the best of my recollection, yes.</p> <p>23 Q And who determined that the reference</p> <p>24 to Q clearance is a reference to the Energy</p> <p>25 Department's highest level of security clearance</p>	<p style="text-align: right;">Page 69</p> <p>1 picked up on the July 4 pledge -- oath was</p> <p>2 that it came, you know, only about ten days</p> <p>3 after the Q persona called for that exact</p> <p>4 oath to be taken. So I think for a lot of</p> <p>5 QAnon supporters or followers, they viewed</p> <p>6 that as a signal to say, you know, "We're</p> <p>7 with you," or solidarity or whatnot.</p> <p>8 BY MR. BISS:</p> <p>9 Q How many millions of other Americans</p> <p>10 took the oath after the Q drop appeared? How</p> <p>11 many other millions?</p> <p>12 MS. BOLGER: Object to the form.</p> <p>13 THE WITNESS: I don't know.</p> <p>14 BY MR. BISS:</p> <p>15 Q You are aware, though, that millions</p> <p>16 of Americans took the same oath?</p> <p>17 A They took the QAnon oath?</p> <p>18 Q Well, you call it a QAnon oath.</p> <p>19 A So there is the oath which is -- the</p> <p>20 first part of the oath is a common oath that's</p> <p>21 taken by elected officials and others, but it's</p> <p>22 the final line which makes it distinct and</p> <p>23 unique, which is Where We Go One We Go All. That</p> <p>24 is not something that is said in a standard oath.</p> <p>25 And that is the precise language that the Flynnns</p>

<p style="text-align: right;">Page 70</p> <p>1 used in their video that they posted publicly on 2 July 4, 2020. That's the precise language that 3 was in the Q post from ten days or so before 4 that. 5 Q Okay. Have you -- other than General 6 Flynn posting that video, have you seen any 7 evidence that General Flynn is Q or founded the 8 QAnon movement? 9 A Well -- 10 MS. BOLGER: Object to the form. 11 THE WITNESS: On the first part of 12 your question, I'm not saying that him 13 posting that video of them taking the QAnon 14 oath is evidence that he is the Q persona. 15 I'm just saying that it's a signal to QAnon 16 supporters and followers. 17 Yeah, I mean, I've seen General 18 Flynn, he's obviously appeared on some QAnon 19 radio shows. I think I saw, you know, he 20 gave an autograph of a book that was posted 21 where, you know, he posted Where We Go One 22 We Go All hashtag slogan. 23 BY MR. BISS: 24 Q Anything else? 25 A It was just kind of general -- just</p>	<p style="text-align: right;">Page 72</p> <p>1 Q Where did it come from? I mean, of 2 all sayings, do you know how they invented it? 3 MS. BOLGER: Object to the form. 4 BY MR. BISS: 5 Q Like Johnson & Johnson has a product 6 and I've struggled with this product for a long 7 time. Do you know what the product is? 8 A No. 9 Q It's a Q-Tip. I have a lot of trouble 10 using Q-Tips because I always think of QAnon. Is 11 that a QAnon slogan? 12 MS. BOLGER: Is there a question? 13 MR. BISS: Yeah. 14 MS. BOLGER: What's the question? 15 MR. BISS: I just asked him. You 16 have to pay attention. 17 MS. BOLGER: Is it about Q-Tips? 18 You can answer the question on Q-Tips. 19 BY MR. BISS: 20 Q Is Q-Tips a QAnon slogan? 21 A No. 22 Q Okay. So where did the Where We Go 23 One We Go All -- how did it become a QAnon 24 slogan? 25 A The Q persona was repeating it in the</p>
<p style="text-align: right;">Page 71</p> <p>1 generally a lot of signal intro in 2020. But I 2 think certainly the oath taken on July 4, 2020 3 was certainly the -- one of the highlights. 4 Q Is the phrase Where We Go One We Go 5 All, is that a phrase that is exclusive -- an 6 exclusive slogan to QAnon? 7 A I think it is the QAnon slogan, yes. 8 Q Is it exclusive to QAnon or can other 9 groups use it, too? Like the Boy Scouts or 10 others? 11 A It is synonymous with QAnon. 12 Q And where does it come from? 13 A Where We Go One We Go All? 14 Q Yeah. When was it first used and what 15 was its purpose? Give me the etymological 16 history of Where We Go One We Go All. 17 MS. BOLGER: Objection to form. 18 THE WITNESS: The slogan, the 19 hashtag, et cetera, in the context of the 20 QAnon movement was posted by -- posted 21 through the Q persona. 22 BY MR. BISS: 23 Q Who first used it? 24 A Who was the first person to ever say 25 it? I don't know.</p>	<p style="text-align: right;">Page 73</p> <p>1 Q forums. 2 Q So it was used in the Q drops and 3 that's how it became a QAnon slogan? 4 A It evolved from there, yeah. 5 Q All right. Do you know whether or not 6 the phrase has been used in other contexts? 7 A I know it was used in a Ridley Scott 8 movie, the director, in his movie White Squall, 9 which I think is from the '90s. They say "Where 10 we go one we go all" in that. 11 Q So that would have predated QAnon? 12 A That's correct. 13 Q Any other context in which the phrase 14 has been used? 15 A In terms of -- I mean, it's often 16 misattributed to the Kennedys, including by 17 Sidney Powell. 18 Q Any other context in which it's been 19 used in history? 20 A I can't say for certain. 21 Q What about the Three Musketeers? I 22 keep hearing it's the phrase that is used in the 23 book The Three Musketeers, "All for one and one 24 for all." Isn't that the same thing? 25 A That's not Where We Go One We Go All.</p>

<p style="text-align: right;">Page 74</p> <p>1 Q Why not?</p> <p>2 A It's different words.</p> <p>3 Q So turn to the next page of the Wall</p> <p>4 Street Journal article. There's a reference to</p> <p>5 Comet Ping Pong in Washington, D.C.?</p> <p>6 MS. BOLGER: Can I just make sure</p> <p>7 we're on the same page, with the flag in the</p> <p>8 middle?</p> <p>9 MR. BISS: The guy wearing the</p> <p>10 QAnon apparel. Is that what you're</p> <p>11 referring to?</p> <p>12 MS. BOLGER: Yes. It looks</p> <p>13 exactly like one of the tweets that</p> <p>14 Mr. Flynn tweeted.</p> <p>15 BY MR. BISS:</p> <p>16 Q I'm asking is that -- you're looking</p> <p>17 at the gentleman wearing the QAnon apparel?</p> <p>18 MS. BOLGER: Which matches exactly</p> <p>19 one of Jack Flynn's tweets.</p> <p>20 BY MR. BISS:</p> <p>21 Q All right. Mr. O'Sullivan, there's a</p> <p>22 reference to Comet Ping Pong in the first full</p> <p>23 paragraph. Do you see that?</p> <p>24 A I do, yeah.</p> <p>25 Q Is one of the QAnon conspiracy</p>	<p style="text-align: right;">Page 76</p> <p>1 A A conspiracy theory, you know, it's</p> <p>2 often put forward as a -- sometimes it can be a</p> <p>3 simple explanation to something that's</p> <p>4 complicated, Around d it's often just purely</p> <p>5 based on fantasy. Sometimes it's based on</p> <p>6 misinformation and disinformation. So, yeah.</p> <p>7 Q Turn to the -- I think it's the next</p> <p>8 page. At the top it says, "What are Facebook,</p> <p>9 YouTube, Twitter and Amazon doing to address</p> <p>10 QAnon?" Let me know when you're there.</p> <p>11 A Yeah.</p> <p>12 Q Were you aware -- at the time that you</p> <p>13 published the report at issue in this case, were</p> <p>14 you aware that the FBI had labeled QAnon as a</p> <p>15 domestic terrorist threat?</p> <p>16 MS. BOLGER: Object to the form.</p> <p>17 THE WITNESS: Yes. And if I</p> <p>18 recall correctly, I think it was from their</p> <p>19 Phoenix field office.</p> <p>20 BY MR. BISS:</p> <p>21 Q All right.</p> <p>22 A I'm not sure if it was a nationwide</p> <p>23 statement. I could stand to be corrected there.</p> <p>24 That's my recollection.</p> <p>25 Q In the bottom portion of the same</p>
<p style="text-align: right;">Page 75</p> <p>1 theories that Hillary Clinton and her former</p> <p>2 campaign chairman, John Podesta, ran a child sex</p> <p>3 ring in a basement of a pizzeria in Washington,</p> <p>4 D.C.? One of the QAnon conspiracy theories?</p> <p>5 MS. BOLGER: Object to form.</p> <p>6 THE WITNESS: That's is what's</p> <p>7 known as the Pizzagate conspiracy theory,</p> <p>8 which came about, I think, before QAnon.</p> <p>9 But certainly in the QAnon forums and things</p> <p>10 there would be a lot of overlap and mention</p> <p>11 of pizza and Pizzagate.</p> <p>12 Q Was it part Pizzagate or is it part of</p> <p>13 QAnon?</p> <p>14 MS. BOLGER: Let him finish,</p> <p>15 Steve.</p> <p>16 Go ahead.</p> <p>17 THE WITNESS: Both.</p> <p>18 BY MR. BISS:</p> <p>19 Q How about Where We Go One We Go All,</p> <p>20 is that part of Pizzagate and QAnon or is it just</p> <p>21 QAnon?</p> <p>22 A It is most commonly associated with</p> <p>23 QAnon.</p> <p>24 Q What is a conspiracy theory? Give me</p> <p>25 your best definition.</p>	<p style="text-align: right;">Page 77</p> <p>1 page, Mr. Forrest, the author of the Wall Street</p> <p>2 Journal article, poses the question, "Is QAnon</p> <p>3 dangerous?" Do you see that?</p> <p>4 A Yes.</p> <p>5 Q I think you told me earlier that it's</p> <p>6 your view that QAnon -- it was your view at the</p> <p>7 time you published the report at issue in this</p> <p>8 case that you believed that QAnon was dangerous?</p> <p>9 MS. BOLGER: Object to the form.</p> <p>10 He did not.</p> <p>11 THE WITNESS: I think what I said,</p> <p>12 and what I believe, is that certainly it has</p> <p>13 the potential to be dangerous and the</p> <p>14 potential to inspire or allow people to</p> <p>15 condone violence, but again, not necessarily</p> <p>16 everybody who has QAnon sympathies is</p> <p>17 violent or dangerous.</p> <p>18 BY MR. BISS:</p> <p>19 Q So your testimony is you could be a</p> <p>20 QAnon follower but not be violent or dangerous?</p> <p>21 A You can be a supporter of QAnon and</p> <p>22 not go on to commit violent acts. I've spoken to</p> <p>23 a lot of them.</p> <p>24 Q So you agree with what I just said?</p> <p>25 You can be a QAnon follower but not be violent or</p>

<p style="text-align: right;">Page 78</p> <p>1 dangerous; correct?</p> <p>2 A That is a possibility, yes.</p> <p>3 Q You can be a QAnon follower but not</p> <p>4 believe in -- that a cabal of Satan-worshipping</p> <p>5 pedophiles controls the government; correct?</p> <p>6 A There isn't the Ten Commandments meant</p> <p>7 of QAnon.</p> <p>8 Q So you agree with me you could be a</p> <p>9 QAnon follower and not believe that a cabal of</p> <p>10 Satan-worshipping pedophiles controls the</p> <p>11 government; correct?</p> <p>12 MS. BOLGER: Object to the form.</p> <p>13 THE WITNESS: Yes, you could</p> <p>14 self-identify as a QAnon follower and not</p> <p>15 necessarily believe that, yes.</p> <p>16 BY MR. BISS:</p> <p>17 Q You could be a QAnon follower and not</p> <p>18 believe that JFK, Jr. survived that plane crash;</p> <p>19 correct?</p> <p>20 A That is something a self-described a</p> <p>21 QAnon follower might say, yes.</p> <p>22 Q You can be a QAnon follower and not</p> <p>23 believe that Hillary Clinton and John Podesta ran</p> <p>24 a child sex ring out of the Comet Ping Pong</p> <p>25 Pizzeria; correct?</p>	<p style="text-align: right;">Page 80</p> <p>1 MR. BISS: You are right about</p> <p>2 that.</p> <p>3 (Exhibit 6 was marked.)</p> <p>4 BY MR. BISS:</p> <p>5 Q Mr. O'Sullivan, I hand you a one-page</p> <p>6 document. I've marked it as Exhibit 6. This is</p> <p>7 a photocopy or a screenshot of the Paramount Plus</p> <p>8 website that contains a for-purchase version of</p> <p>9 the CBS 60 Minutes report entitled "QAnon's -- Q</p> <p>10 sent me. QAnon's corrosive impact on the U.S."</p> <p>11 Have you ever seen that? It's the CBS</p> <p>12 News report that's referenced in the Amended</p> <p>13 Complaint.</p> <p>14 A I recall it. Yeah, I recall it.</p> <p>15 Q Have you ever watched it?</p> <p>16 A I have. I watched it, yeah.</p> <p>17 Q And it features Leslie Stahl?</p> <p>18 A Yes.</p> <p>19 Q And --</p> <p>20 A I don't recall all the details of it,</p> <p>21 but I remember.</p> <p>22 Q Fair enough. I'm not going to ask you</p> <p>23 anything about it because I want to ask you about</p> <p>24 what's written here on the website.</p> <p>25 It says, "Tens of millions of</p>
<p style="text-align: right;">Page 79</p> <p>1 A Yeah. I mean, as I said earlier, I</p> <p>2 think if you got a bunch of QAnon followers in a</p> <p>3 room, they would take issue with the term "QAnon</p> <p>4 followers." They would tell you they're Anons.</p> <p>5 They might say there is no such thing as QAnon.</p> <p>6 There are Q and Anons. There's certainly a lot</p> <p>7 of beliefs, a lot of commonality. It's not like</p> <p>8 something to say, you know, you must believe X, Y</p> <p>9 and Z. The one commonality among, you know, all</p> <p>10 the QAnon followers I've encountered, of which</p> <p>11 there have been many now, is the sharing of the</p> <p>12 memes and the slogans Where We Go One We Go All.</p> <p>13 Q Is Jeffrey Peterson a QAnon follower?</p> <p>14 MS. BOLGER: Object to the form.</p> <p>15 THE WITNESS: Who is Jeffrey</p> <p>16 Peterson?</p> <p>17 BY MR. BISS:</p> <p>18 Q In The Matrix.</p> <p>19 A You're referring to --</p> <p>20 Q I always like to do my Steven Segal</p> <p>21 imitation.</p> <p>22 MS. BOLGER: For the record, it</p> <p>23 was Keanu Reeves, not Steven Segal, Steve.</p> <p>24 MR. BISS: It was who?</p> <p>25 MS. BOLGER: It was Keanu Reeves.</p>	<p style="text-align: right;">Page 81</p> <p>1 Americans believe QAnon's core and false theory</p> <p>2 than an evil cabal Satan-worshipping elites</p> <p>3 commits atrocities against children and controls</p> <p>4 much of the world."</p> <p>5 You see that?</p> <p>6 A Yes.</p> <p>7 Q Do you agree with that statement?</p> <p>8 A It's not a statement I would have</p> <p>9 reported. I think the tens of millions of</p> <p>10 Americans believe QAnon's core, I believe there</p> <p>11 was some polling around this time in 2021 I think</p> <p>12 CBS news was referring to. But, you know, the</p> <p>13 totality of this, I don't agree with, no.</p> <p>14 Q CBS News reports that QAnon's core</p> <p>15 theory is, quote, "that an evil cabal of</p> <p>16 Satan-worshipping elites commits atrocities</p> <p>17 against children and controls much of the world."</p> <p>18 Do you agree that that is QAnon's core</p> <p>19 theory?</p> <p>20 MS. BOLGER: Object to the form.</p> <p>21 Asked and answered.</p> <p>22 THE WITNESS: I think that is -- I</p> <p>23 think -- that is certainly a description</p> <p>24 that was used in media, obviously by CBS</p> <p>25 News and others. But I think, you know,</p>

<p style="text-align: right;">Page 82</p> <p>1 this is February 2021, right, that this 2 aired? 3 BY MR. BISS: 4 Q Yes, sir. 5 A I think people were -- there was a lot 6 of reports done after January 6 about QAnon, 7 including this CBS News story, I guess. And, you 8 know, the more I reported on it, you know, at 9 this time I was, you know, aware of that. You 10 could be a QAnon supporter, follower, and not 11 necessarily believe this core tenet, as CBS News 12 puts it. 13 Q My question for you is, is that an 14 accurate statement of QAnon's core theory? Is 15 that QAnon's core theory? 16 MS. BOLGER: Object to the form. 17 BY MR. BISS: 18 Q In your view? 19 A It's definitely one of the more 20 popular tenets in it, I guess. I don't know if I 21 would say core theory, knowing what I know now. 22 (Exhibit 7 was marked.) 23 Q All right, sir. I'll show you a 24 document that I created just for purposes of 25 identification, and it's -- it is a document that</p>	<p style="text-align: right;">Page 84</p> <p>1 production? 2 MS. BOLGER: Object to the 3 question. Compound. 4 THE WITNESS: I was interviewed as 5 part of this special report, although I 6 think they might have made two versions. I 7 think this might have aired twice, one 8 January 30th, and then maybe another one a 9 few weeks later that was a bit extended. I 10 could be wrong on that. I was in one of 11 them, which is this. So I was interviewed 12 as part of it. 13 BY MR. BISS: 14 Q You were interviewed for one or the 15 other is what you're saying? 16 A I could be sending you guys wrong now. 17 I was interviewed for this. 18 Q Fair enough. 19 A Yeah. Yeah. 20 Q I think we're going to clarify that in 21 one second. 22 A Sorry. 23 (Exhibit 8 was marked.) 24 Q I'm going to hand you another document 25 that I've marked as Exhibit 8, and this is again</p>
<p style="text-align: right;">Page 83</p> <p>1 refers to a document that CNN produced in 2 discovery in this case. It is Bates stamped CNN 3 2001 and it is a copy of the CNN Special Report 4 Inside the QAnon Conspiracy that aired 5 January 30, 2021. 6 MS. BOLGER: For the record, this 7 is a piece of paper that you created, that 8 says those words. That is not CNN002001. 9 MR. BISS: I just said that. 10 MS. BOLGER: But I object to this 11 exhibit. It isn't what it says it is. 12 MR. BISS: You can state your 13 objections. 14 MS. BOLGER: I just did. 15 MR. BISS: Without your run-ons, 16 okay. You state your objection. Objection, 17 relevance. It's succinct. You don't have 18 to give me any type of speech; okay? 19 BY MR. BISS: 20 Q Did you see that special report? 21 A I think I watched most of it, yeah. 22 Q Did you participate in any way in the 23 production of it? Were you asked to supply 24 information? Did you talk to Anderson Cooper at 25 all? Did you participate in any way in the</p>	<p style="text-align: right;">Page 85</p> <p>1 a piece of paper. 2 A Got it, yeah. 3 Q It is a piece of paper that refers to 4 CNN 2003, which is a CNN Special Report dated 5 February 26, 2021, titled "The Cult of QAnon." 6 MS. BOLGER: I'll object again to 7 the exhibit because this is not the CNN 8 Special Report about QAnon. And to the 9 extent that you seek to use it as a proxy, I 10 object. 11 BY MR. BISS: 12 Q On February 26, 2021 CNN ran a special 13 report called The Cult of QAnon; correct? 14 MS. BOLGER: Object to the form. 15 THE WITNESS: I believe so. 16 BY MR. BISS: 17 Q This is the one that you were 18 interviewed for? 19 MS. BOLGER: Object to the form. 20 THE WITNESS: I believe so. 21 BY MR. BISS: 22 Q And did you watch the special report 23 when it was aired? 24 A I watched some of it. Most of it, I 25 think.</p>

<p style="text-align: right;">Page 86</p> <p>1 (Exhibit 9 was marked.)</p> <p>2 Q Mr. O'Sullivan, I hand you a document</p> <p>3 that I have marked as Exhibit 9, and this is a</p> <p>4 transcript of the February 26, 2021 special</p> <p>5 report, The Cult of QAnon. Have you ever seen</p> <p>6 this document before today?</p> <p>7 A I have, yeah.</p> <p>8 Q I just want to ask you some questions</p> <p>9 about some of the things that are in here.</p> <p>10 A Sure.</p> <p>11 Q Mr. Cooper, do you have an opinion as</p> <p>12 to Mr. Cooper's reputation for truthfulness and</p> <p>13 veracity in the community in which he works?</p> <p>14 A He's a respected journalist.</p> <p>15 Q Do you think he's a truthful person?</p> <p>16 A Yes.</p> <p>17 Q When you listened to and reviewed the</p> <p>18 special reports, either the Inside the QAnon</p> <p>19 Conspiracy or The Cult of QAnon, did you notice</p> <p>20 or did you hear any misinformation?</p> <p>21 MS. BOLGER: Object to the form.</p> <p>22 THE WITNESS: I don't recall.</p> <p>23 BY MR. BISS:</p> <p>24 Q Because you're an expert in</p> <p>25 misinformation. Top expert.</p>	<p style="text-align: right;">Page 88</p> <p>1 a fair enough understanding, outline of the</p> <p>2 understanding of QAnon, but I don't think,</p> <p>3 you know -- it's not necessarily -- it</p> <p>4 doesn't outline everything, because as I</p> <p>5 mentioned before, QAnon's beliefs can be</p> <p>6 broad and evolving.</p> <p>7 BY MR. BISS:</p> <p>8 Q You would agree, though, that</p> <p>9 Mr. Anderson's statement is accurate?</p> <p>10 MS. BOLGER: Object to the form.</p> <p>11 THE WITNESS: I think that's, you</p> <p>12 know, a fair summary of a lot of the</p> <p>13 beliefs. I would have added, and I think it</p> <p>14 gets into the piece, you know, the election</p> <p>15 stuff also, but that kind of gets, you know,</p> <p>16 to the point Anderson made here that Trump</p> <p>17 is a messianic figure. It certainly touches</p> <p>18 on a lot of what people who like QAnon might</p> <p>19 follow.</p> <p>20 BY MR. BISS:</p> <p>21 Q You would agree with me, though, this</p> <p>22 doesn't mention anything to do with the election</p> <p>23 at all?</p> <p>24 A I mean, I think it definitely gets</p> <p>25 into it, I'm sure, but I think the fact that</p>
<p style="text-align: right;">Page 87</p> <p>1 What is your definition of</p> <p>2 misinformation?</p> <p>3 A Misinformation is normally false</p> <p>4 information that is shared wittingly or most</p> <p>5 times unwittingly. Well wittingly or</p> <p>6 unwittingly, how people are passing it on.</p> <p>7 Q You agree that's the Department of</p> <p>8 Homeland Security definition?</p> <p>9 MS. BOLGER: Object to form.</p> <p>10 THE WITNESS: I don't know.</p> <p>11 BY MR. BISS:</p> <p>12 Q You don't know. Looking at the</p> <p>13 transcript, I want to ask you some questions</p> <p>14 about some of the things that are in here. The</p> <p>15 very first page, Mr. Anderson represents, quote,</p> <p>16 "QAnon is based on this fantasy that Donald Trump</p> <p>17 is some kind of messianic figure waging a crusade</p> <p>18 against a secret global cabal of Democrats and</p> <p>19 celebrities who worship Satan, sexually abuse</p> <p>20 children and harvest their blood in order to</p> <p>21 extract, ingest a chemical called adrenochrome."</p> <p>22 Do you agree with Mr. Anderson's</p> <p>23 statement?</p> <p>24 MS. BOLGER: Object to the form.</p> <p>25 THE WITNESS: Yeah, I think that's</p>	<p style="text-align: right;">Page 89</p> <p>1 Donald Trump is some kind of messianic figure</p> <p>2 would be a reference to that.</p> <p>3 Q All right. Is that one of the core</p> <p>4 tenets of the QAnon movement, is that Donald</p> <p>5 Trump is some kind of messianic figure?</p> <p>6 MS. BOLGER: Object to the form.</p> <p>7 THE WITNESS: I think for the most</p> <p>8 part, certainly back in 2020 and 2021, Trump</p> <p>9 was definitely a hero. Some QAnon followers</p> <p>10 certainly spoke about him in divine</p> <p>11 circumstances. And actually I interviewed a</p> <p>12 woman around this time called Ashley</p> <p>13 Vanderbilt, no relation to the Vanderbilts,</p> <p>14 but she was a lady in South Carolina, a mom,</p> <p>15 and she was explaining how she had kind of</p> <p>16 got sucked in through TikTok to a lot of the</p> <p>17 QAnon beliefs. And she's a woman of faith.</p> <p>18 Christian. She said, you know, one thing</p> <p>19 that kind of shook her, or in retrospect</p> <p>20 made her a bit concerned about the rabbit</p> <p>21 hole she was going down was she was starting</p> <p>22 to view Trump as the divine figure and</p> <p>23 putting him above God. So in retrospect,</p> <p>24 she said certainly that was something, as</p> <p>25 she was going down the rabbit hole, that was</p>

<p style="text-align: right;">Page 90</p> <p>1 a belief of hers.</p> <p>2 BY MR. BISS:</p> <p>3 Q When did the QAnon movement first</p> <p>4 embrace as one of its tenets the idea that a</p> <p>5 secret global cabal of Democrats and celebrities</p> <p>6 who worship Satan sexually abused children and</p> <p>7 drank their blood in order to ingest a chemical</p> <p>8 called adrenochrome -- when did that become part</p> <p>9 of the QAnon system?</p> <p>10 MS. BOLGER: Object to the form.</p> <p>11 THE WITNESS: I couldn't give you</p> <p>12 an exact date.</p> <p>13 Q Do you recall if it was before or</p> <p>14 after the election of 2020?</p> <p>15 A This kind of thing would have been</p> <p>16 before the election, yeah.</p> <p>17 Q Have you ever in your lifetime ever</p> <p>18 seen any evidence or any documents that would</p> <p>19 show that Jack Flynn or Leslie Flynn subscribed</p> <p>20 to this belief system that a secret cabal of</p> <p>21 Democrats and celebrities sexually abuse children</p> <p>22 and drank their blood to ingest adrenochrome?</p> <p>23 MS. BOLGER: Object to the form.</p> <p>24 Asked and answered.</p> <p>25 You can answer it again.</p>	<p style="text-align: right;">Page 92</p> <p>1 view that a bunch of Democrats and celebrities</p> <p>2 sexually abuse children, drink their blood for</p> <p>3 adrenochrome?</p> <p>4 MS. BOLGER: Object to the form.</p> <p>5 Asked and answered.</p> <p>6 You can answer it again, but this</p> <p>7 is the last time I'm going to let him</p> <p>8 answer.</p> <p>9 MR. BISS: We're going to go to</p> <p>10 the judge, definitely, on this. You are</p> <p>11 deliberately interfering with my deposition.</p> <p>12 BY MR. BISS:</p> <p>13 Q Can you answer the question?</p> <p>14 Specifically with regard to this -- to</p> <p>15 Mr. Cooper's statement that a secret global cabal</p> <p>16 of Democrats and celebrities who worship Satan</p> <p>17 sexually abuse children and harvest their blood</p> <p>18 in order to extract or ingest adrenochrome, have</p> <p>19 you ever seen any evidence that any member of the</p> <p>20 Flynn family has ever believed that or subscribed</p> <p>21 to that belief?</p> <p>22 MS. BOLGER: Object to the form.</p> <p>23 It's been asked and answered repeatedly.</p> <p>24 You can answer it one more time.</p> <p>25 THE WITNESS: As I mentioned --</p>
<p style="text-align: right;">Page 91</p> <p>1 THE WITNESS: I've seen evidence</p> <p>2 of both taking the QAnon oath, and in Jack's</p> <p>3 case posting a lot of QAnon memes and</p> <p>4 slogans and whatnot. And, you know, I can't</p> <p>5 speak for what is in their heart, but I do</p> <p>6 know that from speaking to a lot of former</p> <p>7 QAnon followers and observing, you know,</p> <p>8 current followers or people who in 2021 and</p> <p>9 2020 were followers of this movement, that</p> <p>10 seeing those phrases, slogans, oaths, being</p> <p>11 shared by the Flynn's was extremely important</p> <p>12 because it kind of gave a lot of these</p> <p>13 people a -- the idea that they were on to</p> <p>14 something. That's not to say that all those</p> <p>15 people necessarily believed the adrenochrome</p> <p>16 and all that stuff, but whatever aspects of</p> <p>17 QAnon those people had embraced, seeing the</p> <p>18 Flynn's share the oath was important to them.</p> <p>19 BY MR. BISS:</p> <p>20 Q I would ask you the question again.</p> <p>21 Have you ever seen any documents,</p> <p>22 including during your 10 to 15 hours of</p> <p>23 preparation with the lawyers, have you ever seen</p> <p>24 any documents in which any member of the Flynn</p> <p>25 family has subscribed, endorsed or adhered to the</p>	<p style="text-align: right;">Page 93</p> <p>1 BY MR. BISS:</p> <p>2 Q This is a yes or no question.</p> <p>3 MS. BOLGER: It's not a yes or no</p> <p>4 question.</p> <p>5 MR. BISS: It is.</p> <p>6 MS. BOLGER: He can answer the</p> <p>7 question however he wants under oath.</p> <p>8 BY MR. BISS:</p> <p>9 Q I want you to answer yes or no.</p> <p>10 MS. BOLGER: You don't have to</p> <p>11 answer it the way he tells you to answer it.</p> <p>12 BY MR. BISS:</p> <p>13 Q Have you seen any evidence, yes or no,</p> <p>14 and then you can explain.</p> <p>15 MS. BOLGER: No. Don't tell him</p> <p>16 how to answer a question.</p> <p>17 THE WITNESS: I think the sharing</p> <p>18 of the QAnon memes and slogans to many QAnon</p> <p>19 supporters and followers was a signal that Q</p> <p>20 and the QAnon beliefs was -- they were on to</p> <p>21 something.</p> <p>22 BY MR. BISS:</p> <p>23 Q Anything else you want to add?</p> <p>24 A No.</p> <p>25 Q All right.</p>

<p style="text-align: right;">Page 94</p> <p>1 MR. BISS: Will you mark that part 2 of the transcript, please. 3 BY MR. BISS: 4 Q If you would turn to the fourth page 5 of the exhibit. 6 MS. BOLGER: Just for the record, 7 it's a very long exhibit. I think you 8 should give the witness a chance to read it. 9 MR. BISS: Why? 10 MS. BOLGER: Because you're asking 11 him questions to hold him to account for a 12 document he has never read. 13 MR. BISS: So you can run the 14 clock out. 15 MS. BOLGER: I don't want to run 16 the clock out. You can go off the record to 17 do it. 18 MR. BISS: Why are you interfering 19 with my deposition? 20 MS. BOLGER: Mr. Biss, I want 21 Donie to understand the questions that are 22 being asked, and I think allowing him to 23 read the exhibit, which, by the way, are the 24 rules, is all I can ask of you. 25</p>	<p style="text-align: right;">Page 96</p> <p>1 Q Were you aware that the QAnon belief 2 system included anti-Semitic, anti-Catholic 3 tropes, including that the Jews drank the blood 4 of children? 5 MS. BOLGER: Object to the form. 6 THE WITNESS: Definitely, you 7 know, for some followers of QAnon, that was 8 a part of it. You know, as Anderson Cooper 9 mentions here, you know, QAnon is like a 10 modern-day version twist of an ancient 11 conspiracy theory, oftentimes very 12 anti-Semitic, about the drinking of blood 13 and abuse of children and things like that. 14 So, yeah, that I think kind of 15 also explains a lot of QAnon's success and 16 appeal in some way, in that it's tapping 17 into these ancient or very old tropes and 18 beliefs. So, yeah, that's a part of it. 19 That's not to say that everybody who's a 20 QAnon follower necessarily knows -- 21 necessarily knows this or would endorse this 22 in any way. I mentioned the lady, Ashley 23 Vanderbilt, who is a Christian and, you 24 know, said that anti-Semitism, et cetera, 25 was abhorrent to her.</p>
<p style="text-align: right;">Page 95</p> <p>1 BY MR. BISS: 2 Q Mr. O'Sullivan, if you feel like you 3 have the need to read this entire document when 4 I'm not going to examine you on it, you can go 5 ahead and do so. Just let me know when you're 6 done. 7 MS. BOLGER: You don't have to if 8 you don't want it. I just didn't know if 9 you wanted to. 10 THE WITNESS: I'm happy to proceed 11 for now, yeah. 12 BY MR. BISS: 13 Q All right. Fourth page, if you can 14 turn there. In the -- towards the bottom of the 15 document, the second -- the last full paragraph, 16 it says that, quote, "The ideas that Q puts out 17 are based on theories that have been floating 18 around for centuries and a lot of them are based 19 on, you know, anti-Semitic, anti-Catholic tropes 20 that have been used -- you know, the Nazis said 21 the Jews drank the blood of children in the late 22 '30s. That was one of the things they used 23 against Jews." 24 Do you see that? 25 A Yes.</p>	<p style="text-align: right;">Page 97</p> <p>1 BY MR. BISS: 2 Q Have you ever seen any evidence that 3 Jack Flynn or Leslie Flynn was anti-Semitic or 4 they have ever used or promoted any anti-Catholic 5 tropes or any Nazi symbolism? 6 MS. BOLGER: Objection. Compound. 7 THE WITNESS: I believe the 8 Flynn's, like myself, are Irish Catholics. I 9 could be wrong. As it pertains to my 10 reporting, I've just seen the Flynn's share 11 QAnon slogans and QAnon imagery. 12 BY MR. BISS: 13 Q How many times do you have to say the 14 phrase Where We Go One We Go All before you -- 15 before CNN labels you a QAnon follower? 16 A In the context of this story, the 17 Flynn's were not labeled as QAnon followers. 18 Q You really believe that? 19 A Yes. 20 Q How many times do you have to say 21 Where We Go One We Go All before you are -- 22 become a QAnon follower? 23 MS. BOLGER: Object to the form. 24 THE WITNESS: There isn't -- if 25 you're asking in the context of this story,</p>

<p style="text-align: right;">Page 98</p> <p>1 you know, this was a story that I did about</p> <p>2 an event where there were self-professed</p> <p>3 QAnon followers, or followers of Q, whatever</p> <p>4 way you want to frame it.</p> <p>5 When it came to the Flynn, I had</p> <p>6 put it into the context that, you know,</p> <p>7 Trump had failed to disavow this stuff.</p> <p>8 General Flynn himself had posted the QAnon</p> <p>9 pledge ten days after QAnon -- ten days</p> <p>10 after the Q persona asked people to do so.</p> <p>11 That was the context of it. It wasn't -- it</p> <p>12 didn't call them QAnon followers.</p> <p>13 BY MR. BISS:</p> <p>14 Q How many times do you have to say</p> <p>15 Where We Go One We Go All before you become a</p> <p>16 QAnon follower?</p> <p>17 MS. BOLGER: Objection.</p> <p>18 Objection, asked and answered.</p> <p>19 BY MR. BISS:</p> <p>20 Q Before you become an adherent of the</p> <p>21 belief system as Judge Woods has ruled?</p> <p>22 MS. BOLGER: Object to the form.</p> <p>23 THE WITNESS: I mean, that's just</p> <p>24 not how it works.</p> <p>25</p>	<p style="text-align: right;">Page 100</p> <p>1 gave his word.</p> <p>2 MS. BOLGER: He did not.</p> <p>3 BY MR. BISS:</p> <p>4 Q How many times -- give me a number.</p> <p>5 How many times has Leslie Flynn said the words</p> <p>6 "Where We Go One We Go All"?</p> <p>7 MS. BOLGER: Object to the form,</p> <p>8 and you're badgering the witness. Watch it.</p> <p>9 THE WITNESS: I can't say how many</p> <p>10 times Leslie has said this privately or</p> <p>11 publicly or, you know, in the company of her</p> <p>12 family and others. But for the purpose of</p> <p>13 this story, General Michael Flynn posted</p> <p>14 publicly a video of the family taking this</p> <p>15 QAnon oath, just ten days after the Q</p> <p>16 persona called people to do just that.</p> <p>17 BY MR. BISS:</p> <p>18 Q How many times has Leslie Flynn</p> <p>19 publicly said the words "Where We Go One We Go</p> <p>20 All"?</p> <p>21 A Again, for the context of this story,</p> <p>22 said it in the oath video. Appeared in the oath</p> <p>23 video. Also, we've seen her engage with QAnon</p> <p>24 content on Twitter.</p> <p>25 Q How many times has Leslie Flynn used</p>
<p style="text-align: right;">Page 99</p> <p>1 BY MR. BISS:</p> <p>2 Q So how many times has Leslie Flynn</p> <p>3 ever said the words "Where We Go One We Go All"?</p> <p>4 A Most importantly in our story --</p> <p>5 Q I'm sorry --</p> <p>6 MS. BOLGER: No, no. He's not</p> <p>7 done.</p> <p>8 MR. BISS: He's not answering. I</p> <p>9 said how many times.</p> <p>10 MS. BOLGER: You can't interrupt</p> <p>11 the witness.</p> <p>12 You can answer.</p> <p>13 MR. BISS: You can't -- you're</p> <p>14 interfering with the deposition.</p> <p>15 BY MR. BISS:</p> <p>16 Q I want you to answer my questions like</p> <p>17 you promised at the beginning.</p> <p>18 MS. BOLGER: Stop it.</p> <p>19 BY MR. BISS:</p> <p>20 Q You promised to answer my questions.</p> <p>21 MS. BOLGER: Stop it. He made no</p> <p>22 promises. You can't say that to people.</p> <p>23 MR. BISS: It's on the record.</p> <p>24 MS. BOLGER: It wasn't a promise.</p> <p>25 MR. BISS: It was a promise. He</p>	<p style="text-align: right;">Page 101</p> <p>1 the phrase Where We Go One We Go All or the</p> <p>2 hashtag WWG1WGA, whatever the words are? How</p> <p>3 many times has she used that, published it in</p> <p>4 writing?</p> <p>5 MS. BOLGER: Object to the form.</p> <p>6 THE WITNESS: I don't remember.</p> <p>7 BY MR. BISS:</p> <p>8 Q Do you know if she's ever done it?</p> <p>9 A I don't have that number. She was in</p> <p>10 the QAnon -- in the July 4th video.</p> <p>11 Q Okay. How about Valerie Flynn? How</p> <p>12 many times has Valerie Flynn publicly used the</p> <p>13 phrase Where We Go One We Go All?</p> <p>14 A Again, I don't have that number. But</p> <p>15 my report was a reference to the video.</p> <p>16 Q How about Lori Flynn? How many times</p> <p>17 has she ever publicly stated the phrase Where We</p> <p>18 Go One We Go All?</p> <p>19 A Once again, it's in the video that was</p> <p>20 published by her husband and shared by Jack</p> <p>21 Flynn. And also there's that email from</p> <p>22 December 2020, I believe that we saw through the</p> <p>23 discovery process, where she acknowledges that</p> <p>24 Where We Go One We Go All is related to the QAnon</p> <p>25 conspiracy theory.</p>

<p style="text-align: right;">Page 102</p> <p>1 Q Anything else?</p> <p>2 MS. BOLGER: Object to the form.</p> <p>3 THE WITNESS: I mean, for this</p> <p>4 report, the focus was the video that was</p> <p>5 published by the Flynnns.</p> <p>6 BY MR. BISS:</p> <p>7 Q How many times has General Flynn</p> <p>8 publicly used the phrase Where We Go One We Go</p> <p>9 All?</p> <p>10 A I don't have that number, but he did</p> <p>11 post the video to his -- I think at that point</p> <p>12 many thousands of followers, and ten days after</p> <p>13 the Q persona had called for people to do just</p> <p>14 that.</p> <p>15 Q What evidence do you have that General</p> <p>16 Flynn ever saw that Q drop that you're referring</p> <p>17 to?</p> <p>18 A He posted a video verbatim, saying the</p> <p>19 oath that the Q persona encouraged people to take</p> <p>20 in that Q post. Also, I believe there was a</p> <p>21 hashtag used in the post, if I recall correctly,</p> <p>22 of something along the lines of "take the oath,"</p> <p>23 which was also used in that Q drop.</p> <p>24 Q Do you have any evidence that General</p> <p>25 Flynn saw that Q drop --</p>	<p style="text-align: right;">Page 104</p> <p>1 persona just a few days after the Q persona</p> <p>2 asked people to do so.</p> <p>3 BY MR. BISS:</p> <p>4 Q Do you have any evidence that Jack</p> <p>5 Flynn, Leslie Flynn, Valerie Flynn, Joe Flynn or</p> <p>6 Lori Flynn ever saw the Q drop?</p> <p>7 A Again, I would just say they did</p> <p>8 exactly as what was outlined in the Q drop and,</p> <p>9 you know, based off the Jack Flynn's Twitter</p> <p>10 history, we certainly know that in October 2020,</p> <p>11 when he reposted a literal Q drop, he was in a</p> <p>12 social media environment where this sort of stuff</p> <p>13 was being shared.</p> <p>14 Q All right. Let's go back to Exhibit</p> <p>15 9. I'd like you to turn to the ninth page of the</p> <p>16 exhibit.</p> <p>17 A Is that the one that starts with "Days</p> <p>18 and weeks trying to decipher"?</p> <p>19 Q Yes, sir, it does. Thank you.</p> <p>20 So I want to ask you some questions</p> <p>21 about a couple of lines down it says, "Unknown</p> <p>22 Where We Go One We Go All"; do you see that?</p> <p>23 A Yes.</p> <p>24 Q There's a subsequent "unknown" and</p> <p>25 that states, "There's sort of a rallying cry that</p>
<p style="text-align: right;">Page 103</p> <p>1 MS. BOLGER: Object to the form.</p> <p>2 BY MR. BISS:</p> <p>3 Q -- that you're referring to?</p> <p>4 MS. BOLGER: Object to the form.</p> <p>5 THE WITNESS: The behavior -- his</p> <p>6 behavior would certainly indicate that he</p> <p>7 was aware of it. In some form oftentimes</p> <p>8 people who, you know, follow QAnon or are</p> <p>9 sympathetic to it may not necessarily access</p> <p>10 the Q drop, as it were, on 8chan or 4chan or</p> <p>11 8kun or whatever. But many times it will be</p> <p>12 reposted around Twitter. That's where</p> <p>13 people will see them. In October of 2020,</p> <p>14 Jack himself reposted a Q drop on Twitter.</p> <p>15 So that's also a way for people to see these</p> <p>16 drops, see these messages from Q.</p> <p>17 BY MR. BISS:</p> <p>18 Q Do you have any evidence that Jack</p> <p>19 Flynn, Leslie Flynn, Valerie Flynn or Lori Flynn</p> <p>20 or Joe Flynn ever saw the Q drop that you're</p> <p>21 referring to?</p> <p>22 MS. BOLGER: Object to the form.</p> <p>23 Compound.</p> <p>24 THE WITNESS: They all took part</p> <p>25 in an oath precisely laid out by the Q</p>	<p style="text-align: right;">Page 105</p> <p>1 is Where We Go One We Go All, which is an</p> <p>2 expression of solidarity."</p> <p>3 Do you see that?</p> <p>4 A Yes.</p> <p>5 Q Do you agree that the phrase Where We</p> <p>6 Go One We Go All is an expression of solidarity?</p> <p>7 A Not to be pedantic, but do we know who</p> <p>8 the unknown is here?</p> <p>9 Q No.</p> <p>10 A So the unknown person says that's sort</p> <p>11 of a rallying cry, that is Where We Go One We Go</p> <p>12 All, which is an expression of solidarity.</p> <p>13 Certainly, "Where we go one, we go all" is the</p> <p>14 QAnon slogan and definitely QAnon followers,</p> <p>15 supporters, would see that as an expression of</p> <p>16 solidarity, yes.</p> <p>17 Q So you agree that it's an expression</p> <p>18 of solidarity?</p> <p>19 MS. BOLGER: Objection to form.</p> <p>20 Asked and answered.</p> <p>21 THE WITNESS: It can be seen as an</p> <p>22 expression of solidarity.</p> <p>23 BY MR. BISS:</p> <p>24 Q What else can it be seen as?</p> <p>25 A You know, there isn't a QAnon</p>

<p style="text-align: right;">Page 106</p> <p>1 rulebook, Ten Commandments, as I said, but "Where 2 we go one, we go all" is the QAnon slogan, so to 3 answer your question, I think, yes, it can be 4 seen as an expression of solidarity. 5 Q That's fine. What else can it be seen 6 as? 7 A I suppose it would depend on the 8 context. 9 Q How about an expression of unity? 10 MS. BOLGER: Object to the form. 11 THE WITNESS: In what sense? 12 BY MR. BISS: 13 Q Any sense. An expression of unity 14 "Where we go one, we go all." 15 A I think the context is very important, 16 obviously. 17 Q Okay. Do you agree that the phrase 18 "Where we go one, we go all" is an expression of 19 unity? 20 MS. BOLGER: Object to the form. 21 THE WITNESS: Context is very 22 important. 23 BY MR. BISS: 24 Q Do you agree or not? 25 A I think the premise of your question</p>	<p style="text-align: right;">Page 108</p> <p>1 it was an expression of solidarity unless it 2 was in the context of the solidarity of the 3 QAnon movement. Again, it depends on the 4 context. Sidney Powell falsely stated in 5 the aftermath of this video being published 6 publicly by the Flynnns that the "Where we go 7 one, we go all" slogan had come from a bell 8 on JFK's boat. And that attempt to 9 defend -- that statement in itself is false 10 and also a belief within the QAnon movement, 11 but it's false. The Kennedy library says 12 so. 13 BY MR. BISS: 14 Q Anything else? I'm not sure what that 15 was responsive to, but anything -- 16 A You brought up Sidney Powell in the 17 context of this video, so... 18 Q All right. Fine. Okay. 19 So the next unknown, on the same page 20 in the transcript of the February 26, 2021 21 special report says, "They call each other 22 patriots almost universally." 23 So my question is, is that -- any time 24 you use the phrase "patriot" is that synonymous 25 with a QAnon follower?</p>
<p style="text-align: right;">Page 107</p> <p>1 needs to relate to what context. 2 Q In the context of the QAnon movement. 3 A In the context of -- it depends. In 4 the context of sharing a video publicly on social 5 media on July 4, 2020, ten days after the Q 6 persona asked people to say a specific oath, 7 including the phrase "Where we go one, we go 8 all," and were posted by General Michael Flynn, 9 who is a person who is pointed to as a hero by 10 many in the QAnon movement, and in the context of 11 particularly Jack Flynn's social media activity, 12 I think it would not be reasonable to assume that 13 saying "Where we go one, we go all", in that 14 context is just something that's a pure statement 15 of unity. 16 Q How about in the context of a backyard 17 barbecue in which the Flynn family and their 18 lawyer, Sidney Powell appears, after they had 19 just won a major court victory? 20 A Again, I think it's the same context. 21 Q Okay. Any other -- "Where we go one, 22 we go all," is it an expression of anything else 23 other than solidarity? 24 MS. BOLGER: Object to the form. 25 THE WITNESS: Well, I did not say</p>	<p style="text-align: right;">Page 109</p> <p>1 MS. BOLGER: Object to form. This 2 is an unknown person whose name is not 3 known. 4 BY MR. BISS: 5 Q Is that your understanding? Seeing 6 you're a top expert in the area. 7 MS. BOLGER: Object to the form. 8 He didn't say this. 9 THE WITNESS: It would be helpful 10 to know who the unknown is. I genuinely 11 don't know the context of who is speaking 12 here. But obviously what is being said here 13 is that many QAnon followers call each other 14 patriots. That is, of course, not to say 15 that any person who describes himself as a 16 patriot is an adherent to QAnon. 17 BY MR. BISS: 18 Q You could be a patriot and also be a 19 Canadian citizen who doesn't get to vote; true? 20 MS. BOLGER: Object to the form. 21 THE WITNESS: Would you mind 22 repeating that? 23 BY MR. BISS: 24 Q You could be a patriot and a Canadian 25 citizen who doesn't get to vote?</p>

<p style="text-align: right;">Page 110</p> <p>1 MS. BOLGER: Object to form. 2 BY MR. BISS: 3 Q Is that right? 4 A You could be a -- if you're saying if 5 you're a Canadian living in the U.S. -- 6 Q Yeah. 7 A -- you could love America, for sure. 8 Q You could be -- and that's really what 9 a patriot is, someone who loves America; right? 10 A Yes. Obviously, in the context of 11 this situation -- again, context matters -- there 12 are many patriots. I'm a patriot. I'm a proud 13 U.S. citizen. So this merely, in the context of 14 this transcript, of which we don't know who is 15 speaking, they are just pointing out that QAnon 16 followers will oftentimes call each other 17 patriots. 18 Q And you can be a patriot, person who 19 loves America, and still use the phrase "Where we 20 go one, we go all" and not be a QAnon follower; 21 correct? 22 MS. BOLGER: Can I hear that 23 again? 24 Q You could be a patriot who loves 25 America and still use the phrase "Where we go</p>	<p style="text-align: right;">Page 112</p> <p>1 question. If you understood it, you can 2 answer. 3 THE WITNESS: Would you mind -- 4 Q I'll repeat it. 5 Was the procedural posture of General 6 Flynn's criminal case -- 7 A And the handling of that? 8 MS. BOLGER: Let him ask, Donie. 9 BY MR. BISS: 10 Q Was the procedural posture of General 11 Flynn's criminal case as of July 4, 2020, the 12 date that the video was taken and posted to 13 Twitter, is that part of the overall context of 14 how the statement should be interpreted? 15 A I don't quite understand the question. 16 Q Are you aware that General Flynn had 17 won a major victory in his criminal case some two 18 weeks before the -- maybe three weeks before the 19 July 4 backyard barbecue? 20 MS. BOLGER: Object to the form. 21 THE WITNESS: That sounds 22 familiar. 23 BY MR. BISS: 24 Q Do you know why Sidney Powell was at 25 that barbecue, that family barbecue, on July 4?</p>
<p style="text-align: right;">Page 111</p> <p>1 one, we go all" and not be a QAnon follower; 2 correct? 3 A Again, it would really depend on the 4 context on which you're sharing it, saying that. 5 Q And what would be the context that 6 would be important? 7 A An important context would be, you 8 know, if you happen to say it in days after the Q 9 persona called for you to say it, and in the 10 broader context of sharing memes and slogans that 11 are related to the QAnon movement. That would be 12 an important context. 13 Q Is the 4th of July, is that part of 14 the context? 15 A Correct. 16 Q That is part of the context? 17 A I mean, I think that would be a 18 scenario where the context is different to merely 19 somebody describing themselves as a patriot. 20 Q Was General Flynn's -- was the 21 procedural posture of General Flynn's 22 persecution, was that part of the context of the 23 January -- of the July 4, 2020 barbecue oath? 24 MS. BOLGER: Object to the form. 25 I actually didn't understand the</p>	<p style="text-align: right;">Page 113</p> <p>1 MS. BOLGER: Object to the form. 2 THE WITNESS: No. 3 BY MR. BISS: 4 Q Do you know why her son, Wilson 5 Powell, was there? 6 A No. 7 MS. BOLGER: Steve, if you want to 8 keep asking questions, go ahead. We have 9 lunch outside maybe in 10-15 minutes, we can 10 take a break and have lunch. 11 MR. BISS: Sure. 12 MS. BOLGER: We have lunch for you 13 guys, too. 14 BY MR. BISS: 15 Q Okay. Same page, Mr. O'Sullivan, 16 there's somebody identified by the name of Roose, 17 R-O-O-S-E. Do you know who that is? 18 A I believe that would be Kevin Roose, 19 who's a reporter with the New York Times. 20 Q Do you find him to be a trustworthy, 21 competent reporter? 22 MS. BOLGER: Did you just groan? 23 MR. BISS: No, not at all. 24 MR. FLYNN: My stomach maybe. 25 MS. BOLGER: I think you just</p>

<p style="text-align: right;">Page 114</p> <p>1 groaned when you said New York Times. 2 MR. BISS: I'm anticipating lunch. 3 I'm excited now. 4 MS. BOLGER: You groaned when you 5 said New York Times. 6 MR. BISS: I'm hungry. That's the 7 only reason I'm doing that. 8 MS. BOLGER: That's not true. 9 BY MR. BISS: 10 Q Do you consider him to be a competent, 11 trustworthy reporter? 12 A I followed a lot of his work and it's 13 been good. 14 Q He represents here, "Trusting the plan 15 is an important part of QAnon belief." 16 Do you see that? 17 MS. BOLGER: That's not an end 18 quote. That's part of the sentence. Read 19 the whole sentence. 20 BY MR. BISS: 21 Q Mr. Roose represents, quote, "Trusting 22 the plan is an important part of QAnon belief," 23 and it goes on. 24 Do you see that? 25 A Yes.</p>	<p style="text-align: right;">Page 116</p> <p>1 Roose is right, that sometimes there are 2 predictions that the Q persona makes that don't 3 happen. I think actually one of Q's earliest 4 predictions back in 2017 or so was that Hillary 5 Clinton was about to be arrested and persecuted 6 or charged or something, and of course that 7 didn't pan out. 8 Q Have you ever heard any member of the 9 Flynn family use the phrase "trust the plan"? 10 A I don't recall. 11 Q If you turn ahead a few more pages, 12 you're going to see where you come into this 13 special report. It's a page that begins with 14 Mr. Cooper's statement, quote, "Donie O'Sullivan 15 has been following QAnon for the past year for 16 CNN." Let me know when you get there. 17 A Sorry. I see it. Cooper -- yes. 18 Q All right. So here's my question: 19 The statements that you made during the CNN 20 Special Report on February 26, 2021, were they 21 accurate and truthful in all material respects? 22 MS. BOLGER: Object to form. If 23 you want to ask him a question, at least 24 show him the statements. 25</p>
<p style="text-align: right;">Page 115</p> <p>1 MS. BOLGER: It's not an end quote 2 there. It goes on. 3 MR. BISS: It's the end of the 4 quote as far as this record is concerned. 5 MS. BOLGER: That's exactly my 6 point, Steven. That's not fair. It's not 7 the end of the quote. You're making a 8 record that's false. 9 MR. BISS: If you want to follow 10 up and make some argument, you can do that. 11 But these are improper objections. 12 BY MR. BISS: 13 Q Do you see where he makes that 14 representation? 15 A Yes, and he goes on to say -- he says 16 in full, "Trusting the plan is an important part 17 of QAnon belief because there's sometimes that 18 predictions don't pan out and the things that Q 19 has said would happen don't." 20 Q Do you believe that trusting the plan 21 is an important part of the QAnon belief system? 22 A It's a common slogan, common maxim in 23 the QAnon community, that there is some form of 24 plan and that you trust the plan. That is 25 sometimes a slogan that people say. And Kevin</p>	<p style="text-align: right;">Page 117</p> <p>1 BY MR. BISS: 2 Q You can read all the statements. 3 MS. BOLGER: Then he has to have 4 the chance to read all the statements. 5 MR. BISS: Why don't we take a 6 break for lunch? 7 MS. BOLGER: No, no, no. He can 8 read the statements right now. 9 THE WITNESS: Sorry. 10 MR. BISS: You're just running the 11 clock out is what you're trying to do. 12 MS. BOLGER: I'm not. 13 MR. BISS: It's so obvious. 14 MS. BOLGER: What's the question, 15 Donie? 16 THE WITNESS: I might be on the 17 wrong page, sorry. So is there a timestamp? 18 BY MR. BISS: 19 Q 2325, in the middle. 20 A I think I'm on a later page. 21 MS. BOLGER: Can I lean over to 22 show you where it is? That's you. 23 BY MR. BISS: 24 Q 2325. 25 A Okay.</p>

<p style="text-align: right;">Page 118</p> <p>1 Q So here's my question: We can do it I 2 think the easiest way because there aren't a lot 3 of statements by you. My question is, take a 4 look at the document and you'll see where you are 5 referenced. For instance, on that page it says, 6 "Donie O'Sullivan, CNN business reporter." My 7 question is are the statements that you make, are 8 they truthful and accurate in all material 9 respects? I'm not interested in Anderson Cooper 10 or Ashley Vanderbilt, former QAnon believer. I'm 11 not interested in them. I'm just interested in 12 you. 13 A I'm not trying to be difficult, but I 14 don't fully recall everything I said here. So on 15 the part that begins where I'm speaking, so this 16 is what Instagram does now, save the children, 17 you're looking for information, that was me 18 demonstrating how, you know, you could quickly 19 get pulled into a QAnon content -- QAnon-type 20 content by searching around on some of these 21 platforms. Then I think I appear later, do I? 22 Q I think you have to keep flipping, 23 though. It's a long way -- 24 A I had it there a minute ago. Okay. 25 So then there's another page that I'm</p>	<p style="text-align: right;">Page 120</p> <p>1 THE WITNESS: I don't recall. 2 BY MR. BISS: 3 Q All right. And you know that the 4 Flynns never participated in this QAnon group 5 called QAnon and The Great Awakening. You know 6 no member ever participated in that group; right? 7 MS. BOLGER: Object to form. 8 THE WITNESS: I don't know. 9 BY MR. BISS: 10 Q You certainly haven't seen any 11 evidence that they did? 12 A The evidence I've seen of the Flynns 13 in QAnon are other platforms. I can't say for 14 certain about Gap, but no, I did not see any 15 evidence of that. 16 Q Have you ever seen any evidence that 17 the Flynns have ever talked about the Illuminati? 18 MS. BOLGER: Object to the form. 19 THE WITNESS: I don't recall. 20 BY MR. BISS: 21 Q Have you ever seen any evidence that 22 any member of the Flynn family has ever talked 23 about aliens or Area 51? 24 A I don't recall that. 25 Q Okay. Have you ever seen any evidence</p>
<p style="text-align: right;">Page 119</p> <p>1 on that says, "What we've seen is since after the 2 insurrection when -- so there's a part where I 3 say, "What we've seen is since after the 4 insurrection and Twitter and Facebook already 5 started kicking off a lot of QAnon accounts, seen 6 a lot of QAnon followers move to platforms like 7 Gap. Gap has been a social media platform that's 8 been around for a few years -- it's pretty much 9 one of the most hate-filled platforms out there. 10 So this one QAnon group on Gap called QAnon and 11 The Great Awakening, it has more than 200,000 12 members. And if you're in it you basically live 13 in a parallel universe." Then I stop quoting. I 14 kind of walk through, you know, what users of 15 this Gap channel, this QAnon Gap channel would be 16 seeing. 17 Q The statements that you made there, 18 that you partially read, those are truthful and 19 accurate statements; correct? 20 A Yes. 21 Q Did you ever see any evidence that the 22 Flynns ever posted anything hate-filled or 23 QAnon-related on Gap? 24 MS. BOLGER: Object to the form. 25 Compound.</p>	<p style="text-align: right;">Page 121</p> <p>1 that any member of the Flynn family ever posted 2 any messages on any platform to the extent, 3 referring to the banking system, George Soros? 4 A I don't recall. 5 Q Have you ever seen any evidence that 6 any member of the Flynn family ever insinuated 7 that Hillary Clinton was involved in spirit 8 cooking by Marina Abramovic? 9 MS. BOLGER: Object to the form. 10 MR. BISS: That's spelled 11 A-B-R-A-M-O-V-I-C. 12 THE WITNESS: That's not something 13 I'm familiar with. 14 BY MR. BISS: 15 Q Have you ever seen any evidence of any 16 member of the Flynn family ever accuse Hillary 17 Clinton of being a Satanic witch? 18 A Not publicly. 19 Q How about privately? 20 A No. I think they wanted to lock her 21 up, though. 22 Q Have you ever seen any evidence, other 23 than General Flynn's statement, that any member 24 of the Flynn family ever indicated that they ever 25 wanted to lock Hillary Clinton up, for any</p>

<p style="text-align: right;">Page 122</p> <p>1 reason?</p> <p>2 A Not that I can recall.</p> <p>3 Q The "lock her up" statement, you're</p> <p>4 referring to an incident that occurred at the</p> <p>5 National Republican Convention?</p> <p>6 A That sounds about right.</p> <p>7 Q All right. And that would have been</p> <p>8 in 2016, I believe; correct?</p> <p>9 A I would trust you on that one.</p> <p>10 Q That's before QAnon. All right.</p> <p>11 Are you familiar or do you know</p> <p>12 whether or not the Texas Republican Party ever</p> <p>13 used the slogan "We Are The Storm"?</p> <p>14 A I don't recall.</p> <p>15 Q Are you aware that Tom Hanks was one</p> <p>16 of the dozens of celebrities that QAnon</p> <p>17 supporters accused of being part of the so-called</p> <p>18 global cabal of Satan-worshipping pedophiles?</p> <p>19 A Some QAnon supporters that I have</p> <p>20 encountered believe that, yeah. I encountered</p> <p>21 one, actually, in -- on, I think, Sunset</p> <p>22 Boulevard or Hollywood boulevard in L.A. back in</p> <p>23 October 2020. The guy was wearing a Q top and</p> <p>24 had a sign saying something about Tom Hanks.</p> <p>25 Yeah, that's a familiar one.</p>	<p style="text-align: right;">Page 124</p> <p>1 A That specific belief, no. I've only</p> <p>2 seen the Flynnns engage in sharing QAnon slogans.</p> <p>3 Q Okay. If you turn to the</p> <p>4 third-to-last page of the exhibit, there are a</p> <p>5 couple of follow-up questions.</p> <p>6 In the middle of the page there's a</p> <p>7 reference to you, O'Sullivan that begins, quote,</p> <p>8 "The big belief among," and it goes on." Do you</p> <p>9 see that?</p> <p>10 A Yeah.</p> <p>11 Q So is that a truthful statement?</p> <p>12 A The big belief that you see a lot of</p> <p>13 chatter about right now is the idea that on the</p> <p>14 4th of March Trump is going to come back and that</p> <p>15 on the 5th of March there will be public</p> <p>16 executions of Trumps's political enemies, end</p> <p>17 quote. Yeah, that was the thing that was</p> <p>18 circulating at the time, that there would be</p> <p>19 this -- something would happen on the 4th of</p> <p>20 March. It was -- there was substantial amount of</p> <p>21 chatter about it, but I would still describe it</p> <p>22 as fringe. As far as I can recall, I didn't see</p> <p>23 the Flynnns talking about that.</p> <p>24 Q That was going to be my next question.</p> <p>25 Have you seen any evidence that the Flynnns, any</p>
<p style="text-align: right;">Page 123</p> <p>1 Q Have you ever seen any evidence that</p> <p>2 any member of the Flynn family ever accused Tom</p> <p>3 Hanks of being one of the dozens of celebrities</p> <p>4 that were part of this global cabal of</p> <p>5 Satan-worshipping pedophiles?</p> <p>6 A No.</p> <p>7 Q Is one of the tenets of the QAnon</p> <p>8 belief system that Hillary Clinton and others</p> <p>9 have been arrested and they've been replaced with</p> <p>10 a double?</p> <p>11 MS. BOLGER: Object to the form.</p> <p>12 BY MR. BISS:</p> <p>13 Q Is that one of the QAnon beliefs?</p> <p>14 A That's like a very, very -- I said</p> <p>15 earlier that there's a kind of range of beliefs</p> <p>16 when it comes to QAnon. That's a very out there,</p> <p>17 far down the spectrum of it.</p> <p>18 Yeah, I spoke to one person at a Trump</p> <p>19 rally a year or two ago who -- she was convinced</p> <p>20 that, you know, Joe Biden wasn't in the White</p> <p>21 House and it was on a Hollywood set and things</p> <p>22 like that. That's kind of the very extremist end</p> <p>23 of things, I think.</p> <p>24 Q Have you ever heard any member of the</p> <p>25 Flynn family ever espouse that belief?</p>	<p style="text-align: right;">Page 125</p> <p>1 member of the Flynn family, ever engaged in that</p> <p>2 kind of chatter?</p> <p>3 A As I said, no.</p> <p>4 Q Okay. All right. Last question on</p> <p>5 this document and then we can break for lunch,</p> <p>6 hopefully. Second-to-last page, down at the</p> <p>7 bottom, "Cooper voiceover"; do you see that?</p> <p>8 A Yes.</p> <p>9 Q He describes the QAnon conspiracy</p> <p>10 theories as being, quote, "deranged, sick</p> <p>11 fantasies and dangerous beliefs."</p> <p>12 Do you agree with Mr. Cooper's</p> <p>13 representations?</p> <p>14 MS. BOLGER: I object to the form.</p> <p>15 That's not what that says.</p> <p>16 THE WITNESS: Anderson Cooper</p> <p>17 says, quote, "There have always been</p> <p>18 conspiracy theories but never before have</p> <p>19 they been able to spread so quickly. Just a</p> <p>20 few clicks can take you down a rabbit hole</p> <p>21 of deranged, sick, fantasies and dangerous</p> <p>22 beliefs."</p> <p>23 That's accurate.</p> <p>24 MR. BISS: Okay. All right. No</p> <p>25 other questions on that document. We can</p>

<p style="text-align: right;">Page 126</p> <p>1 break for lunch now. 2 (Whereupon there was a lunch 3 recess from 1:12 p.m. until 1:48 p.m.) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 128</p> <p>1 Q So the first time that the report 2 that's at issue in this case aired was on 3 February 4, 2021; correct? 4 A Correct. 5 MS. BOLGER: Object to the form. 6 BY MR. BISS: 7 Q I want to ask you some questions about 8 some of the things that were said after the 9 report. So if you will turn, sir, to the page 10 that's Bates stamped CNN 33, about the middle of 11 the page there is a statement, "end video clip." 12 You see that? 13 A Yes. 14 Q Then we have Mr. Lemon making the 15 following statement: "That was Donie O'Sullivan 16 there in that QAnon meeting and he's got more 17 details about what could be QAnon's next moves. 18 He's going to tell us after the break," and then 19 it goes on. 20 Do you see that? 21 A Yes. 22 Q All right. My question to you is if 23 you would take a look at the statement on pages 24 33 and 34 that are attributable to you, could you 25 just confirm that those statements are statements</p>
<p style="text-align: right;">Page 127</p> <p>1 AFTERNOON SESSION 2 (Exhibit 10 was marked.) 3 BY MR. BISS: 4 Q Mr. O'Sullivan, we're back on the 5 record after a lunch break. I'm handing you a 6 document I've marked as Exhibit 10. And this is 7 a document that was produced by CNN in discovery 8 in this case, and do you recognize this document? 9 A Yeah, it's the transcript from the 10 show that -- my story aired. 11 Q If you look at page -- the first page 12 of the document, Bates stamped CNN 21. When I 13 say "Bates stamp" I mean there's a number at the 14 bottom right-hand corner of all the documents. 15 CNN 21 on the first page, that's what I call a 16 Bates stamp. 17 On the first page it indicates 18 February 4, 2021, 2200 hours, and the show is CNN 19 Tonight. That's a show that used to be hosted 20 by -- what was that guy's name again, Don Lemon? 21 A That's correct. 22 Q He doesn't host CNN Tonight anymore, 23 does he? 24 A He is now the host of CNN This 25 Morning.</p>	<p style="text-align: right;">Page 129</p> <p>1 that you made on February 4, 2021? 2 A Yeah, that all looks correct to me. 3 Q Did you have any conversations with 4 Mr. Lemon prior to February 4, 2021 about the 5 report? 6 A No. 7 Q Did you have any conversations with 8 him on February 4, 2021 about the report? 9 A Other than what was said on air, I 10 don't believe so. 11 Q Was this just ad libbed? Was this 12 just -- 13 A My answer? 14 Q Yeah. It looks like you're having a 15 conversation with Mr. Lemon. This wasn't 16 scripted, it wasn't rehearsed ahead of time, was 17 it? 18 A No. Most of the time, yeah, most of 19 the time it's a Q and A. Sometimes they'll say, 20 "Oh, we're going to ask you this or that," which 21 might have happened in this case. 22 Q Did you know ahead of time that there 23 was going to be a colloquy after the report 24 aired? 25 A The back-and-forth between Don and I?</p>

<p style="text-align: right;">Page 130</p> <p>1 Yeah.</p> <p>2 Q Did you know what questions he was</p> <p>3 going to ask you?</p> <p>4 A I don't recall specifically, but --</p> <p>5 MS. BOLGER: Don't speculate.</p> <p>6 Neither Mr. Biss nor I want you to</p> <p>7 speculate.</p> <p>8 BY MR. BISS:</p> <p>9 Q So for instance, Mr. Lemon asks you,</p> <p>10 "So you pointed out the sense of the community in</p> <p>11 that meeting, that QAnon would last past Trump.</p> <p>12 So, I mean, what do you think? Tell us, what do</p> <p>13 you think their next moves are?"</p> <p>14 Was that something -- that subject</p> <p>15 matter, was that something that you and Mr. Lemon</p> <p>16 discussed before this colloquy?</p> <p>17 MS. BOLGER: Object to the form.</p> <p>18 THE WITNESS: Not that I recall.</p> <p>19 BY MR. BISS:</p> <p>20 Q Earlier you talked about context and</p> <p>21 the -- before the report aired and in the</p> <p>22 colloquy after the report aired, there's a</p> <p>23 reference to Marjorie Taylor Greene; do you see</p> <p>24 that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 132</p> <p>1 BY MR. BISS:</p> <p>2 Q Do you know whether any member of the</p> <p>3 Flynn family ever had any conversations with</p> <p>4 Marjorie Taylor Greene about QAnon?</p> <p>5 MS. BOLGER: Object to the form.</p> <p>6 THE WITNESS: I do not.</p> <p>7 (Exhibit 11 was marked.)</p> <p>8 BY MR. BISS:</p> <p>9 Q Mr. O'Sullivan, I have handed you a</p> <p>10 document I've marked as Exhibit 11. It's a</p> <p>11 one-page document. It's a still shot of one of</p> <p>12 the -- one of the parts of the report. You'll</p> <p>13 see up in the right-hand corner there is a</p> <p>14 watermark or whatever you want to call it which</p> <p>15 says, "Twitter Michael Flynn July 2020." Down at</p> <p>16 the bottom, across the bottom of the document or</p> <p>17 close to the bottom of the document, is a chyron</p> <p>18 which reads, "Exclusive: CNN goes inside a</p> <p>19 gathering of QAnon followers."</p> <p>20 Do you see that?</p> <p>21 A Yes.</p> <p>22 Q What is this document?</p> <p>23 MS. BOLGER: Object to the form.</p> <p>24 THE WITNESS: This is a freeze</p> <p>25 frame of a -- part of this story, which was</p>
<p style="text-align: right;">Page 131</p> <p>1 Q And I think the context here is that</p> <p>2 there was a vote either on February 4 or shortly</p> <p>3 before February 4 to oust her from certain</p> <p>4 committee assignments?</p> <p>5 MS. BOLGER: You can check the</p> <p>6 transcript for the context of the</p> <p>7 transcript.</p> <p>8 BY MR. BISS:</p> <p>9 Q Did you have that understanding as the</p> <p>10 context for why the report was aired on</p> <p>11 February 4th?</p> <p>12 MS. BOLGER: Object to the form.</p> <p>13 I'm sorry. You mean -- I actually don't</p> <p>14 understand it. Can you ask that again?</p> <p>15 MR. BISS: Sure.</p> <p>16 BY MR. BISS:</p> <p>17 Q Why February 4, 2021? What was the</p> <p>18 context of airing the report on that day?</p> <p>19 MS. BOLGER: Do you mean why did</p> <p>20 it air that day?</p> <p>21 MR. BISS: Yeah.</p> <p>22 THE WITNESS: My best</p> <p>23 recollection, I don't think there was any</p> <p>24 specific reason as far as I can recall.</p> <p>25</p>	<p style="text-align: right;">Page 133</p> <p>1 about three minutes long. And this is a</p> <p>2 freeze frame from a segment within that,</p> <p>3 which I think it was about two seconds.</p> <p>4 BY MR. BISS:</p> <p>5 Q This is the segment of the report in</p> <p>6 which you captured the Flynn family taking the</p> <p>7 oath on July 4, 2020 and used it in the report;</p> <p>8 correct?</p> <p>9 MS. BOLGER: Object to the form.</p> <p>10 THE WITNESS: That was in the</p> <p>11 story, yes.</p> <p>12 BY MR. BISS:</p> <p>13 Q And it was -- who was it that clipped</p> <p>14 that little piece and put it in the report? Who</p> <p>15 created that clip?</p> <p>16 A Who physically clipped it?</p> <p>17 Q Yeah.</p> <p>18 A I wrote the script.</p> <p>19 Q I understand that. We'll get to that</p> <p>20 in a second. Who was the one who physically</p> <p>21 decided to use a clip and use the length of the</p> <p>22 clip and the portions of the clip?</p> <p>23 A Me.</p> <p>24 Q Okay. So you clearly decided just to</p> <p>25 use the portion where the Flynn family said,</p>

<p style="text-align: right;">Page 134</p> <p>1 "Where we go one, we go all"? You made that 2 decision yourself; right? 3 A That is what was most relevant to the 4 report, yes. 5 Q And you chose to leave out "God bless 6 America." You chose to leave out the oath to the 7 Constitution; correct? 8 A What was notable about the video the 9 Flynnns posted, which was widely reported at the 10 time by many outlets in July 2020, was the line 11 "Where we go one, we go all." So that is what 12 was most relevant. 13 Q You chose -- you intentionally chose 14 not to use the portions of the July 4, 2020 video 15 where the Flynn family recited the oath to the 16 U.S. Constitution and also the portion afterward 17 saying, "God bless America"? You purposely chose 18 to omit those portions; correct? 19 A I exercised my editorial judgment. 20 What was notable about this clip that was posted 21 publicly by Michael Flynn, and shared by others 22 in his family, was that this oath came only a few 23 days after the Q persona called for such an oath 24 to be taken, and, you know, as you mentioned 25 yourself, the phrase the -- you know, the first</p>	<p style="text-align: right;">Page 136</p> <p>1 Q Do you have any general understanding 2 as to who would have created that chyron? 3 A Generally it would be somebody who is 4 working on the show. 5 Q Mr. O'Sullivan, this is true, isn't 6 it? So you truncated or edited the July 4, 2020 7 video that was posted to Twitter by General Flynn 8 and you put that chyron on the screen because you 9 wanted to convince viewers that the Flynnns were 10 QAnon followers; correct? 11 A No. 12 Q Can you identify the people in the 13 photo? 14 A Yes. It's General Flynn in the 15 middle. This image isn't super clear, but I 16 believe that's -- as I look at the image, Lori to 17 the right, and then that is -- next to her is 18 Jack and Leslie. Over at the other end, Valerie 19 and Joe, I think. 20 Q All right. Let me ask you this 21 question: Did you know that on February 4, 2021 22 or is that something that you've learned since 23 this litigation was filed? 24 A I knew in February, when this piece 25 published, that the Flynnns had posted this.</p>
<p style="text-align: right;">Page 135</p> <p>1 half of the oath is from an oath that's familiar 2 to people, office takers. People who take office 3 take it. But what was notable and unique was the 4 "Where we go one, we go all" QAnon slogan which 5 was repeated by the Flynnns. 6 Q You created that truncated clip 7 because you wanted to -- you wanted the audience 8 to believe that the Flynn family, all the Flynnns 9 in the lineup here, were QAnon followers? That's 10 why you created the clip and omitted the other 11 portions; correct? 12 MS. BOLGER: Object to the form. 13 THE WITNESS: That is not correct. 14 BY MR. BISS: 15 Q Why didn't you include the other 16 portions, to be fair? 17 A What was most noteworthy was the QAnon 18 slogan which was posted by General Flynn. 19 Q Who created the chyron? 20 A I don't know. 21 Q Was it one of the editors or one of 22 the producers that were assigned working with you 23 on this report? 24 A I don't know. I can speak in general 25 terms, though, but --</p>	<p style="text-align: right;">Page 137</p> <p>1 Q Let's talk about Valerie Flynn on the 2 far left. Did you know on February 4, 2021 that 3 that was Valerie Flynn? 4 A I knew which Flynnns had taken the oath 5 because I read about it. It was widely reported. 6 Would I have been able to point them out at that 7 time, no. But I knew who was in the frame. 8 Q Okay. Did you know -- going to the 9 opposite side, the right, did you know that was 10 Leslie Flynn? 11 A I knew she was in the video. 12 Q Did you know that was her? 13 A I knew she was in the video. As I 14 said, you know, beyond General Michael Flynn, I 15 just knew it was his family members. 16 Q All right. Did you know anything 17 about Leslie Flynn at the time that -- at the 18 time that you published the report on February 4, 19 2021, other than that she appeared in the July 4, 20 2020 video? Did you know anything about her? 21 A Well, I knew she had appeared, as you 22 say, in this video taking the QAnon oath, and was 23 also aware of that there had been social media 24 activity from the Flynnns that was supportive or 25 signaling to QAnon.</p>

<p style="text-align: right;">Page 138</p> <p>1 Q Anything else?</p> <p>2 A I also knew that in an attempt, a</p> <p>3 botched attempt to clarify what this video was,</p> <p>4 Sidney Powell, in turn, repeated a piece of</p> <p>5 misinformation that is familiar among QAnon</p> <p>6 folks.</p> <p>7 Q How did that relate to Leslie Flynn?</p> <p>8 A Sidney Powell gave a statement on</p> <p>9 behalf of the Flynn's, on behalf of General Flynn,</p> <p>10 seeking to clarify what this video was about the</p> <p>11 Flynn family. That was the context.</p> <p>12 Q What else did you know about Leslie</p> <p>13 Flynn before February 4, 2021, other than what</p> <p>14 you testified to?</p> <p>15 A As far as I can recall, that's what I</p> <p>16 knew about her.</p> <p>17 Q When did you go to Leslie Flynn's</p> <p>18 Twitter account and look at tweets or retweets</p> <p>19 that indicated to you that she was a QAnon</p> <p>20 follower?</p> <p>21 MS. BOLGER: Object to form.</p> <p>22 THE WITNESS: I don't recall.</p> <p>23 BY MR. BISS:</p> <p>24 Q Was it before February 4, 2021 or</p> <p>25 after?</p>	<p style="text-align: right;">Page 140</p> <p>1 evidence?</p> <p>2 MS. BOLGER: Object to the form.</p> <p>3 Asked and answered.</p> <p>4 THE WITNESS: Don't recall.</p> <p>5 BY MR. BISS:</p> <p>6 Q At the time that you published the</p> <p>7 report on February 4, 2021, did you have any</p> <p>8 other evidence that Leslie Flynn was a QAnon</p> <p>9 follower?</p> <p>10 A I don't recall.</p> <p>11 Q Jack Flynn; what evidence did you have</p> <p>12 at the time you published the report on</p> <p>13 February 4, 2021 that Jack Flynn was a QAnon</p> <p>14 follower?</p> <p>15 A Jack Flynn's Twitter timeline I was</p> <p>16 familiar with through reporting. I don't</p> <p>17 specifically recall what tweets I might have</p> <p>18 seen, but I do recall just reporting. And that</p> <p>19 he, along with Joe in particular, had been</p> <p>20 sharing QAnon memes.</p> <p>21 Q You said Joe in particular?</p> <p>22 A Yes.</p> <p>23 Q How about anything else for Jack</p> <p>24 Flynn? Any other evidence that you had at the</p> <p>25 time you published the report on February 4, 2021</p>
<p style="text-align: right;">Page 139</p> <p>1 A I was aware prior to February 4th that</p> <p>2 there was social media activity from the Flynn's</p> <p>3 that was signaling, was viewed as signaling to</p> <p>4 QAnon. I can't recall specifically about her</p> <p>5 feed.</p> <p>6 Q And what did you learn that indicated</p> <p>7 that Leslie Flynn was signaling QAnon?</p> <p>8 A Again, she appears in this video.</p> <p>9 Q What about her Twitter feed indicated</p> <p>10 that she was signaling QAnon or she was a QAnon</p> <p>11 follower or she had some other attachment to</p> <p>12 QAnon?</p> <p>13 A Well, through this legal process, I</p> <p>14 know there's tweets that she liked in relation to</p> <p>15 QAnon.</p> <p>16 Q How about before this? I want to know</p> <p>17 before this litigation, at the time you published</p> <p>18 the report.</p> <p>19 A She appeared in this video.</p> <p>20 Q Anything else -- any other evidence</p> <p>21 that you had that led you to the conclusion that</p> <p>22 she was a QAnon follower?</p> <p>23 A They're seen in this video taking the</p> <p>24 QAnon oath and repeating the slogan.</p> <p>25 Q I'll ask it again. Any other</p>	<p style="text-align: right;">Page 141</p> <p>1 that Jack Flynn was a QAnon follower?</p> <p>2 A Again, I was familiar with the</p> <p>3 reporting on the Flynn's flirting with the QAnon</p> <p>4 conspiracy theory, and of course there's this</p> <p>5 video.</p> <p>6 Q Anything else?</p> <p>7 A Not that I recall.</p> <p>8 Q Lori Flynn, what evidence did you have</p> <p>9 at the time of publication on February 4, 2021</p> <p>10 that Lori Flynn was a QAnon follower?</p> <p>11 I might add, she's wearing a USA</p> <p>12 shirt; correct?</p> <p>13 A I can't see that in this image.</p> <p>14 Q You can't see it?</p> <p>15 A Excuse me. Lori? Are you talking</p> <p>16 about Lori?</p> <p>17 Q Yeah, Lori Flynn. You do recognize</p> <p>18 that that's Lori Flynn wearing the USA shirt?</p> <p>19 A Yes, General Flynn's wife.</p> <p>20 Q Right.</p> <p>21 A Well, you said -- you characterize her</p> <p>22 as a QAnon follower. I would point out that we</p> <p>23 did not call them -- call the Flynn's QAnon</p> <p>24 followers.</p> <p>25 Q Oddly enough, it's right in the chyron</p>

<p style="text-align: right;">Page 142</p> <p>1 there, "QAnon followers"?</p> <p>2 A The chyron reads, "CNN goes inside a</p> <p>3 gathering of QAnon followers."</p> <p>4 Q That looks like a gathering right</p> <p>5 there, doesn't it? Backyard barbecue gathering?</p> <p>6 MS. BOLGER: Let him answer.</p> <p>7 THE WITNESS: The chyron clearly</p> <p>8 is a reference to the QAnon event that I</p> <p>9 attended in Arizona, which I believe this</p> <p>10 chyron stayed up throughout the story. It</p> <p>11 was clear the entire premise of the story</p> <p>12 was based around the QAnon gathering in</p> <p>13 Arizona. You know, this clip of the Flynns</p> <p>14 was used to give context to the fact that</p> <p>15 Trump and his former national security</p> <p>16 advisor had flirted with the QAnon</p> <p>17 conspiracy theory and had echoed the</p> <p>18 slogans.</p> <p>19 This is obviously a selective</p> <p>20 freeze frame from a three-minute piece.</p> <p>21 There are other scenes in this story, too,</p> <p>22 where the chyron also stayed up, including</p> <p>23 an NBC Town Hall with Savannah Guthrie,</p> <p>24 including a Trump rally, including a shot</p> <p>25 with an expert, Travis Hugh, so I think it</p>	<p style="text-align: right;">Page 144</p> <p>1 that General Flynn was a QAnon follower?</p> <p>2 A We didn't call him a QAnon follower,</p> <p>3 but that's -- there was quite a hefty body of</p> <p>4 reporting on Flynn's flirtation with QAnon.</p> <p>5 Q What were these podcasts that you</p> <p>6 testified about, these shows, these podcasts</p> <p>7 where General Flynn flirted or indicated in some</p> <p>8 manner that is he is a QAnon follower?</p> <p>9 MS. BOLGER: Object to form.</p> <p>10 THE WITNESS: There's the QAnon</p> <p>11 Anonymous podcast, which is a podcast that</p> <p>12 is run by non-QAnon believers who report on</p> <p>13 the phenomena. They would have talked a lot</p> <p>14 about how the Flynns, Michael Flynn</p> <p>15 specifically, was a central figure in all of</p> <p>16 this, in the QAnon movement, a hero, and how</p> <p>17 he wasn't necessarily shying away from that.</p> <p>18 There's also podcasts or radio shows,</p> <p>19 whatever you want to call it, run by -- I</p> <p>20 think it would be fair to call them fans of</p> <p>21 Q, fans of QAnon, called In the Matrix,</p> <p>22 where, if I recall correctly, you know, a</p> <p>23 lot of talk about Flynn there and how --</p> <p>24 social media postings and whatnot from the</p> <p>25 Flynns was an indication that the Flynns</p>
<p style="text-align: right;">Page 143</p> <p>1 would be clear to a reasonable person</p> <p>2 watching this story that the gathering that</p> <p>3 is being referred to is not the NBC News</p> <p>4 Town Hall, is not the expert in a room and</p> <p>5 is not this barbecue.</p> <p>6 BY MR. BISS:</p> <p>7 Q At the time you published the report</p> <p>8 on February 4, 2021, what evidence did you have</p> <p>9 that General Flynn was a QAnon follower?</p> <p>10 A Well, this video, of course. Again, I</p> <p>11 will just point out that we did not allege</p> <p>12 General Michael Flynn was a QAnon follower. We</p> <p>13 have this video, of course, and a representative</p> <p>14 of General Flynn, when asked about this video,</p> <p>15 failed to clarify it in a way that would make it</p> <p>16 clear that it had nothing to do with QAnon. And</p> <p>17 I had seen, you know, multiple references, you</p> <p>18 know, on QAnon shows and QAnon forums of Flynn</p> <p>19 signaling to the QAnon group.</p> <p>20 I think, if I recall correctly, one</p> <p>21 QAnon influencer, self-described QAnon-type</p> <p>22 person, shared a picture of a signature -- an</p> <p>23 autograph the general gave that included the</p> <p>24 "Where we go one, we go all" hashtag.</p> <p>25 Q Anything else? Any other evidence</p>	<p style="text-align: right;">Page 145</p> <p>1 were with them as such. And of course this</p> <p>2 pledge video being very, very important.</p> <p>3 BY MR. BISS:</p> <p>4 Q So was General Flynn on this QAnon</p> <p>5 Anonymous podcast or is this just some commentary</p> <p>6 from somebody you found on the internet?</p> <p>7 MS. BOLGER: Object to form.</p> <p>8 THE WITNESS: I don't believe</p> <p>9 General Flynn appeared on the QAnon</p> <p>10 Anonymous podcast.</p> <p>11 BY MR. BISS:</p> <p>12 Q How about In the Matrix, is this some</p> <p>13 type of show where General Flynn appeared and</p> <p>14 made some type of statements?</p> <p>15 A I think he might have been on the</p> <p>16 show, but I can't say for certain.</p> <p>17 Q Was there any other evidence that</p> <p>18 General Flynn was ever a QAnon follower?</p> <p>19 A We didn't call him a QAnon follower.</p> <p>20 Q Any other evidence that General Flynn</p> <p>21 was an adherent to the QAnon system, as Judge</p> <p>22 Woods plainly and unequivocally ruled?</p> <p>23 MS. BOLGER: Objection to form,</p> <p>24 calls for a legal conclusion.</p> <p>25 THE WITNESS: Yeah, I wouldn't say</p>

<p style="text-align: right;">Page 146</p> <p>1 I would call him an adherent here. I think</p> <p>2 it was clear in the report, too, that the</p> <p>3 slogan had been used by him.</p> <p>4 BY MR. BISS:</p> <p>5 Q How many times has General Flynn ever</p> <p>6 used the slogan, as you call it?</p> <p>7 A I don't know.</p> <p>8 Q What do you mean you don't know?</p> <p>9 A How many times he's used the slogan?</p> <p>10 Q All of your expertise and all of your</p> <p>11 research, you don't know how many times he's used</p> <p>12 it?</p> <p>13 A I don't know specifically the amount</p> <p>14 of times.</p> <p>15 Q Do you know if he's used it more than</p> <p>16 once?</p> <p>17 A Yes.</p> <p>18 Q When was the second time he used it?</p> <p>19 A As I mentioned earlier, I said he</p> <p>20 signed an autograph, if I recall correctly, where</p> <p>21 he signed, "Where we go one, we go all."</p> <p>22 Q What was the context of that?</p> <p>23 A It was -- I saw it on a QAnon forum, a</p> <p>24 person who had a book signing with Flynn or had</p> <p>25 met him at some event. That was the autograph.</p>	<p style="text-align: right;">Page 148</p> <p>1 THE WITNESS: Not to my</p> <p>2 recollection, but, again, this video, which</p> <p>3 Flynn himself posted, who has many, many</p> <p>4 followers, it was important as evidenced by</p> <p>5 how widely reported it was at the time.</p> <p>6 BY MR. BISS:</p> <p>7 Q Did you happen to review it on July 4,</p> <p>8 2020, when it was posted?</p> <p>9 A To the best of my recollection, I</p> <p>10 remember reading it around July 4th or 5th or</p> <p>11 6th.</p> <p>12 Q Fair enough. Did you happen to read</p> <p>13 Sidney Powell's many posts on July 4, 2020 about</p> <p>14 the video?</p> <p>15 A I recall reading a response she had</p> <p>16 given to the Washington Examiner, which I believe</p> <p>17 CNN used in its reporting also.</p> <p>18 Q Did you review her tweets?</p> <p>19 A I may have. I can't recall.</p> <p>20 Q What evidence did you have as of</p> <p>21 February 4, 2021, when the report was published,</p> <p>22 that Joe Flynn was a QAnon follower?</p> <p>23 A We didn't allege he was a QAnon</p> <p>24 follower, but I know he had posted quite a bit on</p> <p>25 social media, again, signaling to QAnon.</p>
<p style="text-align: right;">Page 147</p> <p>1 Q Do you know the circumstances why he</p> <p>2 signed it that way?</p> <p>3 A He may have been asked to. But I</p> <p>4 don't know. I'm speculating.</p> <p>5 Q Other than the book signing and the</p> <p>6 backyard barbecue, do you know whether General</p> <p>7 Flynn has ever used the phrase "Where we go one,</p> <p>8 we go all"?</p> <p>9 A I can't say for sure. What we're</p> <p>10 looking at right now, this Exhibit 11, where</p> <p>11 they're giving the QAnon oath ten days after the</p> <p>12 Q persona called for it, there's an expression in</p> <p>13 QAnon followers, QAnon adherents, they like to</p> <p>14 say there's no such thing as coincidences. So</p> <p>15 them seeing something like this in the broader</p> <p>16 context, with QAnon merchandise being sold linked</p> <p>17 to the Flynn's, a post from Jack and Joe and</p> <p>18 others, this is a clear signal to them that the</p> <p>19 Flynn's are on their side and the Flynn's like</p> <p>20 QAnon.</p> <p>21 Q Do you know of any other instances,</p> <p>22 other than the book signing and the backyard</p> <p>23 barbecue in July of 2020, in which General Flynn</p> <p>24 has used the phrase "Where we go one, we go all"?</p> <p>25 MS. BOLGER: Objection.</p>	<p style="text-align: right;">Page 149</p> <p>1 Q Can you identify any of those social</p> <p>2 media posts?</p> <p>3 A I can't recall.</p> <p>4 Q Do you have copies of them?</p> <p>5 A I'm not sure.</p> <p>6 Q What do you mean you're not sure? You</p> <p>7 would know if you had copies.</p> <p>8 MS. BOLGER: Object to the form.</p> <p>9 THE WITNESS: I'm not sure.</p> <p>10 BY MR. BISS:</p> <p>11 Q Did you turn over -- were you</p> <p>12 requested by counsel, Ms. Bolger, to search for</p> <p>13 and turn over documents?</p> <p>14 A Yes.</p> <p>15 MS. BOLGER: What was the</p> <p>16 question? I didn't hear you.</p> <p>17 BY MR. BISS:</p> <p>18 Q Were you asked by counsel for CNN,</p> <p>19 Ms. Bolger to search for and turn over documents</p> <p>20 that showed that the various Flynn family members</p> <p>21 were QAnon followers?</p> <p>22 A I was asked to produce any documents</p> <p>23 relevant to this case, and I did that, yes.</p> <p>24 Q What did you do to search for</p> <p>25 documents?</p>

<p style="text-align: right;">Page 150</p> <p>1 A I did an extensive search through my 2 social media, direct messages, text messages. 3 Some emails, too, I suppose. My notes. In the 4 case of the -- in the case of the Flynn's social 5 media, that would have been something that I 6 would have been reviewing and monitoring kind of 7 throughout 2020, 2021, so it wasn't as if I had 8 them centralized in one place. 9 Q Did you have any screenshots of any 10 social media posts by any Flynn family members 11 that you kept in a file somewhere or that you 12 saved to a computer? 13 A I don't believe so. 14 Q So was it just your good memory that 15 Joe Flynn had posted something about QAnon? 16 A It was a very widely reported, 17 known -- 18 Q Reported by whom? 19 MR. BISS: Let him finish the 20 answer. 21 THE WITNESS: You could find 22 multiple accounts and multiple outlets who 23 documented that. 24 BY MR. BISS: 25 Q Outlets? What do you mean, outlets?</p>	<p style="text-align: right;">Page 152</p> <p>1 Q Yes. 2 A Yes. 3 Q All right. 4 A And I watch Fox. I watch them all. 5 Try to keep up with the Irish news as well. 6 Q All right. So what evidence did you 7 have on February 4, 2021, at the time that the 8 report was published, that Valerie Flynn was a 9 QAnon follower? 10 A We didn't call her a QAnon follower, 11 and, again, we had this video that she appeared 12 in, taking the QAnon pledge. 13 Q Anything else? 14 A Not that I recall. 15 Q What did you know about Valerie Flynn 16 at the time you published the report on 17 February 4, 2021? 18 A I knew she had appeared in this video 19 alongside Michael Flynn, taking the QAnon oath. 20 And was a supporter of Michael Flynn. 21 Q Anything else? 22 A To the best of my recollection, 23 that's -- I don't recall. 24 Q Do you know if she had any children? 25 A I don't recall.</p>
<p style="text-align: right;">Page 151</p> <p>1 A News outlets. 2 Q What do you mean, news outlets? 3 A News outlets. 4 Q Are you talking about The Daily Beast? 5 A That would probably be one outlet that 6 might have reported on it, I suppose. 7 Q How about Media Matters, do you think 8 that's a news outlet? 9 A No. 10 Q How about Vice, do you think that's a 11 news outlet? 12 A Vice employs some very good employees, 13 yes. 14 Q How about Gizmodo, you think that's a 15 news outlet? 16 A Gizmodo employs some good journalists. 17 Q Think you think those are news 18 outlets, Daily Beast, Vice, Gizmodo? 19 MS. BOLGER: Object to form. 20 BY MR. BISS: 21 Q Is that where you get your news? 22 A I get my news from a variety of 23 sources. 24 Q How about CNN? 25 A Do I get my news from CNN?</p>	<p style="text-align: right;">Page 153</p> <p>1 Q Do you know if she was employed or 2 what her work background was? 3 A I don't recall. 4 Q Do you know what her standing was in 5 the community in which she lived? 6 A I don't recall. 7 Q Did you make any effort to -- before 8 the report was published, did you make any effort 9 to learn anything about the various targets in 10 the lineup here? 11 MS. BOLGER: Object to the form. 12 THE WITNESS: I would not agree 13 with that characterization as targets. 14 BY MR. BISS: 15 Q Let me rephrase it. 16 Before CNN published the report on 17 February 4, 2021, did you do anything to learn 18 about who Valerie Flynn was, who Lori Flynn was, 19 who Leslie Flynn was? 20 A We had -- as it pertains to this 21 video, this statement from Sidney Powell which 22 was issued after this video was posted, which 23 essentially was further evidence that Sidney 24 Powell and the Flynn's were steeped in the QAnon 25 lexicon.</p>

<p style="text-align: right;">Page 154</p> <p>1 Q What evidence did you have or what 2 evidence do you have that Sidney Powell, when she 3 spoke with the Washington Examiner, that she was 4 acting as an agent for Valerie Flynn, Joe Flynn, 5 Lori Flynn, Jack Flynn, or Leslie Flynn, or 6 General Flynn for that matter? 7 A The statement that was issued, if I 8 recall correctly, was, I think, characterized as 9 a response on behalf of General Michael Flynn. 10 Q And only General Flynn; correct? 11 MS. BOLGER: Object to the form. 12 You're misleading the witness. You are. 13 THE WITNESS: May I ask how I'm 14 being misled? 15 BY MR. BISS: 16 Q Just answer the question if you can. 17 If you can't answer the question, tell me that, 18 too. 19 A The Flynn's had been given an 20 opportunity to clarify what had happened here, 21 and the response that was given from Sidney 22 Powell was repeating more QAnon garbage. 23 Q Did you make any effort to contact any 24 member of the Flynn family for comment before you 25 published the February 4, 2021 report?</p>	<p style="text-align: right;">Page 156</p> <p>1 into the story that was published by CNN in 2 July of 2020, but, you know, clearly, per 3 our normal procedures, there would have been 4 an effort to represent if there was a 5 comment from the Flynn's. In that case it 6 came through Sidney Powell. 7 BY MR. BISS: 8 Q Do you remember when I asked you and 9 you agreed that not to speculate at the very 10 beginning of the deposition? Do you remember I 11 went over that road rule with you? 12 MS. BOLGER: Object to the form. 13 You didn't enter into a binding contract 14 with him. You gave him instructions that I 15 objected to at the time. 16 MR. BISS: You can object. 17 MS. BOLGER: I just did. 18 MR. BISS: That's not an objection 19 at all. 20 BY MR. BISS: 21 Q Do you remember when I went over that 22 with you? 23 A Remind me. 24 Q Do you remember when I asked you not 25 to speculate and you said you wouldn't?</p>
<p style="text-align: right;">Page 155</p> <p>1 A When this story -- when this incident 2 originally happened, CNN I thought would have 3 sought comment and also then included a comment 4 from Sidney Powell in the reporting. So we had 5 already -- that had already been achieved. 6 Q So the answer is no, you made no 7 effort to contact any member of the Flynn family 8 before the report was aired on February 4, 2021; 9 correct? 10 A CNN had reported what the Flynn's had 11 to say for themselves. 12 Q Did you make any effort to contact 13 Valerie Flynn before February 4, 2021? 14 A Again, CNN had reported what the 15 Flynn's had said. 16 Q Who contacted Valerie Flynn? 17 MS. BOLGER: Object to form. 18 BY MR. BISS: 19 Q What I'm hearing you say is CNN 20 contacted the Flynn's. Who contacted Valerie 21 Flynn? 22 MS. BOLGER: Object to the form. 23 THE WITNESS: I'm not familiar 24 with the story that was published by -- I'm 25 not familiar with all the work that went</p>	<p style="text-align: right;">Page 157</p> <p>1 MS. BOLGER: Object to the form. 2 BY MR. BISS: 3 Q Do you remember that? 4 MS. BOLGER: Object to the form. 5 THE WITNESS: I'm trying to be 6 helpful. 7 BY MR. BISS: 8 Q Do you know whether anyone at CNN 9 whether that was in July of 2020 or in February 10 of 2021, do you know if anyone ever contacted 11 Valerie Flynn for comment? 12 A I know that CNN included a response 13 from Sidney Powell. 14 Q Do you know if anyone contacted 15 Valerie Flynn? 16 A I know that CNN included a response 17 from Sidney Powell. 18 MR. BISS: Will you mark that 19 portion of the transcript, please. 20 BY MR. BISS: 21 Q Do you know whether or not, prior to 22 airing the report on February 4, 2021, no one 23 from CNN reached out or made any effort to 24 contact Joe Flynn for comment? 25 A Again, when I came to this video that</p>

<p style="text-align: right;">Page 158</p> <p>1 Michael Flynn had posted publicly of his family 2 taking a QAnon oath ten days after the Q persona 3 called for people to do just this, for them to do 4 exactly what we're seeing here, CNN's reporting 5 around that story, around this video, includes a 6 comment from a representative for the Flynnns. 7 Q Do you know if anyone contacted Joe 8 Flynn, prior to airing the report on February 4, 9 2021, for comment? 10 MS. BOLGER: Asked and answered. 11 THE WITNESS: I know we have 12 Sidney Powell's statement. 13 BY MR. BISS: 14 Q Did you contact anyone? 15 A Can you clarify? 16 Q Did you contact Joe Flynn? 17 A No. 18 Q Did you contact Sidney Powell for 19 comment? 20 A No. Because we already had Sidney 21 Powell's statements, and if I may add Sidney 22 Powell's statement was full of misinformation, 23 and we try not to -- 24 Q You're talking about her statement to 25 the Washington Examiner?</p>	<p style="text-align: right;">Page 160</p> <p>1 other kind of document. 2 A It depends on how you reach out to the 3 person. 4 Q What you did here, Mr. O'Sullivan, is 5 you reached out to one source, Jeffrey Peterson, 6 In the Matrix. That's the only source that you 7 reached out to. You deliberately avoided 8 reaching out to the Flynnns here for any comment 9 because you wanted this report to be as one-sided 10 as possible; isn't that true? 11 A No. 12 Q You keep talking about a Q drop that 13 appeared ten days or so before the July 4, 2020 14 barbecue. That's what you're talking about, a 15 Q drop? 16 A Yes. 17 Q Did that Q drop end with the words 18 "God bless America"? 19 A I know it included "Where we go one, 20 we go all." 21 Q That's not what I asked you. Did it 22 end with "God bless America"? 23 A I don't recall. 24 Q Why not? Why isn't that something 25 that's not right in front of your mind?</p>
<p style="text-align: right;">Page 159</p> <p>1 A About the bell. 2 Q That's the statement you're talking 3 to? 4 A That's the statement she gave after 5 this video was posted publicly by Michael Flynn. 6 Q Did you reach out to Sidney Powell 7 before February 4, 2021 for comment? 8 A CNN already had her comment. 9 Q That's the only comment that it had, 10 was what the Washington Examiner published; 11 correct? 12 A That is the statement that CNN 13 included in its previous reporting, yes. 14 Q Did you or to the best of your 15 knowledge anyone at CNN ever reach out to Lori 16 Flynn, Jack Flynn or Leslie Flynn for comment 17 before the report aired on February 4, 2021? 18 A Not that I recall, and I can't speak 19 for what my colleagues would have done. 20 Q Is it your normal business practice to 21 document -- when you reach out to a source for a 22 comment, is it your normal, customary business 23 practices to document the matter? 24 A In what way? 25 Q An email, a text message, memo, any</p>	<p style="text-align: right;">Page 161</p> <p>1 A Because the relevant and unique part 2 of the oath was "Where we go one, we go all." 3 Q Do you suffer from any ailments or 4 disabilities that would affect your memory? 5 A No. 6 Q Or your ability to tell the truth? 7 A No. 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 (Exhibit 12 was marked.) 15 Q Mr. O'Sullivan, I hand you a copy of a 16 document I've marked as Exhibit 12. It's a 17 one-page document. It is a screenshot of an 18 internet archive of the -- of a portion of the 19 Rachel Maddow Show which aired on MSNBC on 20 March 12, 2021, and it features the photo, the 21 still photo of the Flynn family members in the 22 backyard on July 4 of 2020. 23 Have you ever seen this still shot 24 before? 25 MS. BOLGER: Object to the form.</p>

<p style="text-align: right;">Page 162</p> <p>1 THE WITNESS: I don't think so.</p> <p>2 BY MR. BISS:</p> <p>3 Q Did you watch the Rachel Maddow Show</p> <p>4 on March 12, 2021?</p> <p>5 A I can't recall.</p> <p>6 Q Is that somebody who you get your news</p> <p>7 from?</p> <p>8 A I'd watch her occasionally.</p> <p>9 Q Now if you compare Exhibit 11 to</p> <p>10 Exhibit 12, my question is this: Why did CNN</p> <p>11 take no care whatsoever to blur out the images of</p> <p>12 Jack Flynn, Leslie Flynn, Valerie Flynn and Joe</p> <p>13 Flynn?</p> <p>14 MS. BOLGER: Object to the form.</p> <p>15 THE WITNESS: The MSNBC clip shown</p> <p>16 here in Exhibit 12, was that a still MSNBC</p> <p>17 showed or was it a video?</p> <p>18 BY MR. BISS:</p> <p>19 Q I'm pretty sure it was a still shot.</p> <p>20 MS. BOLGER: Object to form.</p> <p>21 Don't answer the question if you</p> <p>22 don't know if it's a still shot. You can't</p> <p>23 speculate.</p> <p>24 So far this is a document from the</p> <p>25 internet archives that just says</p>	<p style="text-align: right;">Page 164</p> <p>1 Flynn, Lori Flynn, Joe Flynn and Valerie Flynn?</p> <p>2 MS. BOLGER: Objection.</p> <p>3 BY MR. BISS:</p> <p>4 Q Why didn't you do the same thing and</p> <p>5 show the same care, I hate to say it, that the</p> <p>6 Rachel Maddow showed?</p> <p>7 MS. BOLGER: Object to the form.</p> <p>8 We don't know how Rachel Maddow shot it.</p> <p>9 THE WITNESS: This is a video that</p> <p>10 Michael Flynn posted himself on an account.</p> <p>11 Some of his family members reposted.</p> <p>12 BY MR. BISS:</p> <p>13 Q So general Flynn didn't post Exhibit</p> <p>14 12 with the oval, whatever that's called in the</p> <p>15 production business. Why didn't CNN show the</p> <p>16 Flynn's the same courtesy that MSNBC did?</p> <p>17 MS. BOLGER: Objection. Asked and</p> <p>18 answered. And also we don't know what MSNBC</p> <p>19 did.</p> <p>20 MR. BISS: It's right there.</p> <p>21 MS. BOLGER: No. This is your</p> <p>22 representation of -- this is what your</p> <p>23 representation of what MSNBC did. We don't</p> <p>24 know what the rest of the report was.</p> <p>25 MR. BISS: You can go look on the</p>
<p style="text-align: right;">Page 163</p> <p>1 Archives.org. I'm going to ask the witness</p> <p>2 not to answer the question.</p> <p>3 MR. BISS: Are you instructing him</p> <p>4 not to answer?</p> <p>5 MS. BOLGER: I'm going to tell --</p> <p>6 say that you, Steve, if you're going to make</p> <p>7 a representation that this is a still shot</p> <p>8 and it's not a still shot, it's going to be</p> <p>9 a misrepresentation. I mean, I'll seek</p> <p>10 sanctions for it. If you want to say it's a</p> <p>11 still shot --</p> <p>12 MR. BISS: You're just bumbling</p> <p>13 through this. You don't know what you're</p> <p>14 doing. I'm telling you, Kate, this is</p> <p>15 improper interference with a deposition.</p> <p>16 MS. BOLGER: If it's a still shot,</p> <p>17 say it's a still shot. If you don't know,</p> <p>18 say "I don't know." But he's not answering</p> <p>19 a question based on speculation.</p> <p>20 BY MR. BISS:</p> <p>21 Q Mr. O'Sullivan, here's my question:</p> <p>22 MSNBC blurred out, or whatever it's called in the</p> <p>23 production business, and put an oval over just</p> <p>24 General Flynn. Why didn't CNN take any care to</p> <p>25 blur out the identities of Leslie Flynn, Jack</p>	<p style="text-align: right;">Page 165</p> <p>1 internet for yourself, or you can continue</p> <p>2 your state of denial.</p> <p>3 MS. BOLGER: My objection remains.</p> <p>4 You can answer if you can.</p> <p>5 BY MR. BISS:</p> <p>6 Q Do you know why CNN didn't do anything</p> <p>7 at all to blur out or whatever this is called</p> <p>8 that MSNBC did?</p> <p>9 MS. BOLGER: Object to the form.</p> <p>10 We don't know that MSNBC did this. You are</p> <p>11 representing that.</p> <p>12 THE WITNESS: I mean, I can</p> <p>13 speak -- I think the context does actually</p> <p>14 matter, whether this was an MSNBC shot that</p> <p>15 was up on the screen as a still for many</p> <p>16 seconds or if it is from the video. I think</p> <p>17 that actually does matter.</p> <p>18 I can say from our perspective,</p> <p>19 from what the CNN piece was, we took the</p> <p>20 relevant part of the video that Michael</p> <p>21 Flynn himself posted on social media and the</p> <p>22 Flynn's shared, and I believe it was less</p> <p>23 than two seconds or about two seconds of a</p> <p>24 three-minute or so long piece. If I recall</p> <p>25 correctly, in our clip we show Michael Flynn</p>

<p style="text-align: right;">Page 166</p> <p>1 saying the words "Where we go one, we go 2 all," which is also what I wrote directly to 3 in my script. I said something along the 4 lines of, you know, a slogan that has been 5 promoted, or something along those lines, by 6 Michael Flynn. 7 BY MR. BISS: 8 Q Was there any discussion, prior to the 9 publication of the report on February 4, 2021, 10 about whether or not accusing the Flynn's of being 11 QAnon followers would cause them harm, cause harm 12 to their reputations? 13 MS. BOLGER: Object to form. 14 THE WITNESS: We didn't accuse 15 them of being QAnon followers. 16 BY MR. BISS: 17 Q Was there any discussion, prior to 18 publication of the report on February 4, 2021, 19 about whether the publication of the Flynn's' 20 images together with a chyron that says, "CNN 21 goes inside a gathering of QAnon followers" would 22 cause harm to the Flynn's and their reputations? 23 MS. BOLGER: Objection to form. 24 THE WITNESS: Taking the question 25 in two parts, the first, the video that the</p>	<p style="text-align: right;">Page 168</p> <p>1 footage of the violent insurrection at the 2 Capitol along with statements and images about 3 prominent figures of the QAnon movement who would 4 later go on to participate in the insurrection. 5 You juxtaposed the truncated clip with all those 6 other matters; correct? 7 A It was important to show how people 8 like Trump and Flynn, by signaling to QAnon in 9 this way, the QAnon followers, that it helped 10 enable, encourage this, and contributed to 11 getting us to the place where we were in February 12 of 2021. 13 Q You took the video that General Flynn 14 posted on July 4, you clipped it, you omitted 15 material portions of it, and you stuck it in 16 another report that talked about the 17 insurrection, and then included video of the 18 violent, seditious acts of QAnon -- a QAnon mob; 19 isn't that true? 20 MS. BOLGER: Object to the form. 21 THE WITNESS: No. 22 BY MR. BISS: 23 Q Okay. You think that it was fair the 24 way you portrayed the Flynn's in the February 4, 25 2021 report? You think that was a fair</p>
<p style="text-align: right;">Page 167</p> <p>1 Flynn's themselves published online, that had 2 been widely reported since the previous 3 July, is what we showed in our report. And 4 the chyron, I think, to any reasonable 5 viewer, they would know that the chyron was 6 about what the substantive part of the 7 piece, which was the QAnon gathering in 8 Arizona, which the entire piece was about. 9 BY MR. BISS: 10 Q Would you agree with me that QAnon as 11 a movement changed between July of 2020 and 12 February of 2021? 13 A I think QAnon has always been 14 evolving. 15 Q You agree with me, it was evolving? 16 A It was always evolving. 17 Q It was much more violent and extremist 18 by February of 2021; correct? 19 MS. BOLGER: Object to the form. 20 THE WITNESS: Not -- I don't know 21 if I would agree with that characterization. 22 BY MR. BISS: 23 Q So the clip of the backyard barbecue 24 that CNN chose to air, the truncated clip, you 25 put that in a three-minute plus report along with</p>	<p style="text-align: right;">Page 169</p> <p>1 portrayal? 2 A Yes. 3 (Exhibit 13 was marked.) 4 Q I'm going to hand you a document I've 5 marked as Exhibit 13. 6 MS. BOLGER: Can we just take a 7 quick break so I can make a quick telephone 8 call? 9 MR. BISS: Not a problem. 10 (Whereupon there was a brief 11 recess from 2:45 p.m. until 3:00 p.m.) 12 BY MR. BISS: 13 Q Mr. O'Sullivan, we took a break. 14 We're back. I've handed you a document that I've 15 marked as Exhibit 13. Could you identify this 16 document for us? 17 A Yeah. It is a transcript of another 18 airing of this story. 19 Q This was the next day, February 5, on 20 CNN Newsroom with Brooke Baldwin; correct? 21 A Correct. 22 Q Who made the decision to air it 23 multiple times? 24 MS. BOLGER: Object to the form. 25 THE WITNESS: I don't know.</p>

<p style="text-align: right;">Page 170</p> <p>1 BY MR. BISS:</p> <p>2 Q Was it something that you contemplated</p> <p>3 at the time that you created the report, that it</p> <p>4 would be aired on CNN Tonight, CNN Newsroom?</p> <p>5 A It depends on the news cycle, but a</p> <p>6 lot of times the story would air a few times,</p> <p>7 yes.</p> <p>8 Q And is the purpose of airing the story</p> <p>9 a few times to take advantage of the news cycle?</p> <p>10 MS. BOLGER: Object to the form.</p> <p>11 THE WITNESS: What did you mean,</p> <p>12 sorry?</p> <p>13 BY MR. BISS:</p> <p>14 Q Is the purpose for republishing the</p> <p>15 report multiple times to take advantage of the</p> <p>16 news cycle?</p> <p>17 A You can tell me if I'm not answering</p> <p>18 your question, because I'm not sure I understand</p> <p>19 it, but what I meant by a news cycle, if there's</p> <p>20 a huge breaking news story like a terror attack</p> <p>21 or something like that, that then a news package</p> <p>22 like this may not run again because it would get</p> <p>23 preempted by that breaking news. For the most</p> <p>24 part stores like this, with original reporting,</p> <p>25 would air multiples times.</p>	<p style="text-align: right;">Page 172</p> <p>1 the terrible attack on the Capitol on January 6,</p> <p>2 I was actually there reporting on the ground that</p> <p>3 day, but a lot of people, a lot of Americans,</p> <p>4 people around the world, had questions as to how</p> <p>5 did this all happen. And as I had been covering</p> <p>6 this world of misinformation for quite a few</p> <p>7 years, you know, it was important for me to help</p> <p>8 give context to all of what happened, and what</p> <p>9 led up to a lot of this and how QAnon had grown,</p> <p>10 lies about the election were spreading. So I did</p> <p>11 a number of stories throughout January, February,</p> <p>12 March, where I was trying to give people a better</p> <p>13 understanding of this. This was one of those</p> <p>14 stories.</p> <p>15 Q You write -- you state on camera, the</p> <p>16 paragraph that begins, "And Brooke"; do you see</p> <p>17 that?</p> <p>18 A Yeah.</p> <p>19 Q Is that all truthful and accurate?</p> <p>20 MS. BOLGER: Do you mean just that</p> <p>21 paragraph?</p> <p>22 MR. BISS: Just that paragraph.</p> <p>23 THE WITNESS: Yes.</p> <p>24 BY MR. BISS:</p> <p>25 Q And then among others things,</p>
<p style="text-align: right;">Page 171</p> <p>1 Q Fair enough.</p> <p>2 If you turn to page CNN 7, the last</p> <p>3 page, I think it's the last page of the document,</p> <p>4 there's a colloquy after the report airs that</p> <p>5 begins "after end videotape"; do you see that?</p> <p>6 A Yeah.</p> <p>7 Q You state on camera to Brooke Baldwin,</p> <p>8 "And Brooke, as we go into this impeachment trial</p> <p>9 next week," and it goes on. Do you see that?</p> <p>10 A Yes.</p> <p>11 Q Was that the second impeachment trial</p> <p>12 of the president?</p> <p>13 A Yes.</p> <p>14 Q Was the purpose of publishing the</p> <p>15 report on February 4, 2021 to get some negative</p> <p>16 press about Donald Trump ahead of the impeachment</p> <p>17 trial?</p> <p>18 MS. BOLGER: Object to the form.</p> <p>19 THE WITNESS: No.</p> <p>20 BY MR. BISS:</p> <p>21 Q Because you would agree with me you</p> <p>22 did a real quick turnaround on getting this</p> <p>23 package put together; correct?</p> <p>24 A Kind of what was happening after</p> <p>25 the -- naturally, you know, when everybody saw</p>	<p style="text-align: right;">Page 173</p> <p>1 Ms. Baldwin says to you, quote, "Please keep</p> <p>2 digging up these stories and just educating us on</p> <p>3 who these people are and how they think. Donie</p> <p>4 O'Sullivan, thank you so much." And you reply,</p> <p>5 "Thanks, Brooke."</p> <p>6 See that?</p> <p>7 A Yes.</p> <p>8 Q Did you make any effort to advise</p> <p>9 Brooke Baldwin that the Flynnns were -- should</p> <p>10 be -- were and should be treated differently than</p> <p>11 the QAnon Shaman who you also featured in the</p> <p>12 report?</p> <p>13 A As I wrote directly to in the script,</p> <p>14 the reference to General Michael Flynn and Trump</p> <p>15 was to show how the QAnon world was getting these</p> <p>16 signals from Flynn and Trump and so, you know,</p> <p>17 that is why they were included in that. You</p> <p>18 know, obviously, then we made clear that the</p> <p>19 likes of the QAnon Shaman had gone on to storm</p> <p>20 the Capitol.</p> <p>21 Q When the magistrate judge in this case</p> <p>22 said that everybody you featured in that report</p> <p>23 were all treated as QAnon followers, she was</p> <p>24 correct?</p> <p>25 A No.</p>

<p style="text-align: right;">Page 174</p> <p>1 MS. BOLGER: Object to the form.</p> <p>2 BY MR. BISS:</p> <p>3 Q What efforts did you make to</p> <p>4 distinguish the Flynns, any of the Flynn family</p> <p>5 members, from Alan Hostetter or any other person</p> <p>6 who went on to commit acts of insurrection on</p> <p>7 January 6?</p> <p>8 A I think it was clear in the piece that</p> <p>9 the reference to General Michael Flynn, the video</p> <p>10 that they had posted publicly, and then we</p> <p>11 clearly detailed how Alan Hostetter had gone on</p> <p>12 to take part in the insurrection.</p> <p>13 Q Ms. Baldwin just says "these people."</p> <p>14 MS. BOLGER: Object to the form.</p> <p>15 BY MR. BISS:</p> <p>16 Q That's who she meant; right?</p> <p>17 MS. BOLGER: Object to the form.</p> <p>18 THE WITNESS: I didn't understand</p> <p>19 it that way.</p> <p>20 BY MR. BISS:</p> <p>21 Q You thought it meant who?</p> <p>22 A I thought -- I would go back to the --</p> <p>23 that there's a range in terms of beliefs when it</p> <p>24 comes to QAnon, and I think she meant folks who,</p> <p>25 you know, engaged in the QAnon world or QAnon</p>	<p style="text-align: right;">Page 176</p> <p>1 insurrection who were committing violence,</p> <p>2 breaking into the Capitol. You made no effort to</p> <p>3 distinguish the Flynns from the violent</p> <p>4 insurrectionists, did you?</p> <p>5 MS. BOLGER: Object to the form.</p> <p>6 Asked and answered.</p> <p>7 THE WITNESS: I think it's clear</p> <p>8 in the report.</p> <p>9 BY MR. BISS:</p> <p>10 Q And the reason that you didn't make</p> <p>11 any distinction, the reason you didn't correct</p> <p>12 Ms. Baldwin and say, "There's a distinction,</p> <p>13 Brooke, to be made between the Flynns, who we</p> <p>14 feature in the report, and the violent</p> <p>15 insurrectionists," the reason you didn't make any</p> <p>16 effort to distinguish the Flynns from the violent</p> <p>17 insurrectionists is because you wanted the</p> <p>18 readers and the viewers to believe that the</p> <p>19 Flynns were violent insurrectionists, same as the</p> <p>20 Shaman, same as Hostetter --</p> <p>21 MS. BOLGER: Object to the form.</p> <p>22 BY MR. BISS:</p> <p>23 Q And the others --</p> <p>24 MS. BOLGER: Object to the form.</p> <p>25 THE WITNESS: Not at all.</p>
<p style="text-align: right;">Page 175</p> <p>1 slogans, whatever it might be. Again, one</p> <p>2 extreme of folks who had gone on to commit</p> <p>3 violence, but then also others who do not.</p> <p>4 Q Did she tell you that or are you just</p> <p>5 trying to read her mind?</p> <p>6 MS. BOLGER: He's answering the</p> <p>7 question you asked him.</p> <p>8 BY MR. BISS:</p> <p>9 Q Did she tell you that or did you --</p> <p>10 A I think it was clear in the context of</p> <p>11 the piece.</p> <p>12 Q But in any case, all she says is</p> <p>13 "these people." You agree with that; right?</p> <p>14 MS. BOLGER: Object to the form.</p> <p>15 THE WITNESS: She's talking about</p> <p>16 me being in the room at this QAnon event,</p> <p>17 the Shaman. And says, "Continue your work."</p> <p>18 BY MR. BISS:</p> <p>19 Q She doesn't say that at all. "Please</p> <p>20 keep digging up these stories and educating us on</p> <p>21 who these people are and how they think." And</p> <p>22 you said, "Thanks, Brooke."</p> <p>23 So you made no effort to distinguish</p> <p>24 the Flynns from the Shaman, Alan Hostetter, the</p> <p>25 people in the report, in the video of the</p>	<p style="text-align: right;">Page 177</p> <p>1 (Exhibit 14 was marked.)</p> <p>2 BY MR. BISS:</p> <p>3 Q I'll hand you a document that I've</p> <p>4 marked as Exhibit 14. This is a document</p> <p>5 produced in discovery by CNN in this case. Can</p> <p>6 you identify it for us?</p> <p>7 A It is the report airing -- excuse me.</p> <p>8 I think it shows the piece airing again.</p> <p>9 Q So this is -- if you turn to the first</p> <p>10 page of the document, Bates stamp CNN 8, this</p> <p>11 indicates that this is a transcript of a</p> <p>12 broadcast on February 6, CNN Newsroom with Ana</p> <p>13 Cabrera; is that correct?</p> <p>14 A That is what it appears to be, yes.</p> <p>15 Q If you would turn to CNN 15, I just</p> <p>16 have a couple of questions.</p> <p>17 Did you have any discussions with</p> <p>18 Ms. Cabrera about the QAnon or the report or the</p> <p>19 Flynns?</p> <p>20 A Not that I recall.</p> <p>21 Q Was the post airing of the report</p> <p>22 here, was this all just on the go, ad lib? There</p> <p>23 was no script for any of this?</p> <p>24 MS. BOLGER: Object to the form.</p> <p>25 THE WITNESS: I don't recall.</p>

<p style="text-align: right;">Page 178</p> <p>1 BY MR. BISS:</p> <p>2 Q Okay. And the statements that you</p> <p>3 made to Ms. Cabrera or to her viewers on</p> <p>4 February 6, 2021, are these statements truthful</p> <p>5 and accurate?</p> <p>6 MS. BOLGER: What statements are</p> <p>7 you talking about?</p> <p>8 MR. BISS: The statements that he</p> <p>9 made beginning on CNN 15 and going through</p> <p>10 CNN 16, where it's indicated "O'Sullivan."</p> <p>11 THE WITNESS: Yes. That all looks</p> <p>12 accurate to me.</p> <p>13 And I'll also point out, we aired</p> <p>14 a clip of Ashley Vanderbilt, who's a former</p> <p>15 QAnon believer, to also show there were</p> <p>16 regular people, who didn't commit violence,</p> <p>17 were also getting sucked into this thing.</p> <p>18 That lady was brave enough to speak out and</p> <p>19 speak to us and, you know, unequivocally</p> <p>20 condemn and disavow this conspiracy theory.</p> <p>21 BY MR. BISS:</p> <p>22 Q Yet you lacked the common courtesy to</p> <p>23 contact Jack Flynn before you aired this report</p> <p>24 and labeled him a QAnon follower. You lacked the</p> <p>25 common courtesy to contact him, but you want me</p>	<p style="text-align: right;">Page 180</p> <p>1 tweets?</p> <p>2 A Yes.</p> <p>3 Q You prepared them and then you</p> <p>4 published them on your Twitter account?</p> <p>5 A Yeah.</p> <p>6 Q The first one is February 4, 2021.</p> <p>7 Why did you publish that tweet?</p> <p>8 A Because I wanted to let people know</p> <p>9 that we had this story coming.</p> <p>10 Q And you had -- how many followers did</p> <p>11 you have at that time?</p> <p>12 A Around then, the 200,000 mark.</p> <p>13 Q Did you try to get any of your pals at</p> <p>14 CNN to help you get the word out? Just call up</p> <p>15 Mr. Darcy and say, "Ollie, a little solid for</p> <p>16 your buddy Donie"? Did you do that?</p> <p>17 MS. BOLGER: Object to form.</p> <p>18 BY MR. BISS:</p> <p>19 Q Did you try to get anybody, like</p> <p>20 Stelter, with his 100 million followers, did you</p> <p>21 try to get him to publish this to as wide an</p> <p>22 audience as possible?</p> <p>23 MS. BOLGER: Object to form.</p> <p>24 BY MR. BISS:</p> <p>25 Q Or no?</p>
<p style="text-align: right;">Page 179</p> <p>1 to give you some bonus points or something</p> <p>2 because you talked to this Vanderbilt person and</p> <p>3 she's courageous?</p> <p>4 A We didn't call him a QAnon follower.</p> <p>5 Q Okay. One question here on 16, second</p> <p>6 line from the bottom. You say to Ms. Cabrera,</p> <p>7 quote, "She speaks like she's a former believer.</p> <p>8 She's called this out for what it is, a</p> <p>9 ridiculous, dangerous conspiracy theory."</p> <p>10 Do you see that?</p> <p>11 A Yes.</p> <p>12 Q Is that a truthful statement?</p> <p>13 MS. BOLGER: Object to the form.</p> <p>14 THE WITNESS: Yes, I think so.</p> <p>15 (Exhibit 15 was marked.)</p> <p>16 BY MR. BISS:</p> <p>17 Q All right, Mr. O'Sullivan, I hand you</p> <p>18 a copy of a document, sir. It is a one-page</p> <p>19 document. Can you identify it for us; 15?</p> <p>20 A It's a tweet I sent saying we have</p> <p>21 this story coming.</p> <p>22 Q The document consists of two tweets;</p> <p>23 correct?</p> <p>24 A Yes.</p> <p>25 Q And you're the author of both of these</p>	<p style="text-align: right;">Page 181</p> <p>1 A Not that I can recall, no.</p> <p>2 Q Do you recall any effort to try to</p> <p>3 boost the audience numbers?</p> <p>4 A No. I mean, you know, when I have a</p> <p>5 story coming that I'm proud of, oftentimes</p> <p>6 I'll -- especially, you know, I interact with a</p> <p>7 lot of experts who kind of work at the social</p> <p>8 media platforms or in the misinformation space on</p> <p>9 Twitter, so, you know, when I have a new story I</p> <p>10 would post it out there. Then also post the</p> <p>11 story itself.</p> <p>12 Q Did you work with any of the</p> <p>13 misinformation experts at Twitter?</p> <p>14 MS. BOLGER: Object to the form.</p> <p>15 BY MR. BISS:</p> <p>16 Q Regarding this story?</p> <p>17 MS. BOLGER: Object to the form.</p> <p>18 THE WITNESS: No. Not that I</p> <p>19 recall.</p> <p>20 BY MR. BISS:</p> <p>21 Q Including those who have been</p> <p>22 summarily fired by Elon Musk?</p> <p>23 MS. BOLGER: Object to the form.</p> <p>24 THE WITNESS: I didn't work with</p> <p>25 any of them on this story, as far as I can</p>

<p style="text-align: right;">Page 182</p> <p>1 recall. 2 BY MR. BISS: 3 Q Do you remember what time of the day 4 you published the February 4 tweet? 5 A I don't. 6 Q We might see a document later on that 7 might refresh your recollection on that. 8 A All right. 9 Q The February 5 tweet -- so by this 10 time on February 5 it's already aired on CNN 11 Tonight; correct? 12 A Yes, it would have. 13 Q Do you know whether Don Lemon ever 14 tweeted it out? 15 A No. 16 Q Did you ever have any discussions 17 about him tweeting it out? 18 A No. 19 Q Okay. At the time that the report 20 aired, were you aware that it was going to be 21 tweeted out by other accounts associated with 22 CNN? 23 A I mean, that happens with most 24 stories. 25 Q And the purpose -- what was the</p>	<p style="text-align: right;">Page 184</p> <p>1 A I'm a blue check. 2 Q You know that some of your followers 3 are blue checks with a lot of followers? 4 A Yes. 5 Q Was it your intention when you 6 published the February 5 tweet that your 7 followers would then amplify the breadth of the 8 publication? 9 A I don't really think about that that 10 much, to be honest. But any kind of new, 11 original reporting I have, obviously, as any 12 journalist would, like people to read it or watch 13 it. So that would have been the case here, too. 14 Q Were you aware at the time that you 15 published your tweet on February 5, were you 16 aware that CNN either had or was going to upload 17 the video report, the video of the report, to its 18 YouTube channel? 19 A I wouldn't have known for sure, no. 20 Some reports go up. 21 Q Do you subscribe to the CNN YouTube 22 channel? 23 A Do I subscribe? I check in on it. I 24 don't know if I'm a subscriber. Yeah, I watch 25 videos on it.</p>
<p style="text-align: right;">Page 183</p> <p>1 purpose of the February 5, 2021 tweet? 2 A Just linking the full story so people 3 could watch it. 4 Q That was the purpose of you 5 republishing it on February 5, 2021; correct? 6 A Yes. 7 Q You wanted at least your 200,000 8 followers to look at it? 9 A I doubt that I had all look at it. I 10 post pretty much most of my stories, I post to my 11 Twitter account. 12 Q You've got some pretty heavy hitting 13 followers, people who follow you, don't you? 14 MS. BOLGER: Object to the form. 15 If you know what it means, you can 16 answer it. 17 BY MR. BISS: 18 Q You have some blue checks with a lot 19 of followers who follow you. You're aware of 20 that; right? 21 MS. BOLGER: Objection. 22 BY MR. BISS: 23 Q You know wham a blue check is? 24 A I know wham a blue check is, yeah. 25 Q Because you're a blue check?</p>	<p style="text-align: right;">Page 185</p> <p>1 Q All right. 2 (Exhibit 16 was marked.) 3 Mr. O'Sullivan, I hand you a copy of a 4 document. I've marked that as Exhibit 16. It's 5 a one-page document. It's a screenshot of a 6 tweet by CNN Newsroom dated February 5, 2021. 7 Were you aware that CNN Newsroom had 8 published this tweet on February 5, 2021? 9 MS. BOLGER: I'll object. The 10 tweet itself was actually the video. You 11 have done the freeze frame here. 12 You can answer, Donie. 13 THE WITNESS: I don't recall. 14 BY MR. BISS: 15 Q Do you know who or what CNN Newsroom 16 is, other than a Twitter account? Do you know 17 who operates it? 18 A CNN Newsroom is the name of -- it's 19 what they call -- what they did call, they might 20 call, some hours of CNN TV, so they call it CNN 21 Newsroom. This is the Twitter account for that 22 show, or hours, or however you would like to 23 describe it. And I don't know who would have 24 been running the account at that time, to my 25 recollection.</p>

<p style="text-align: right;">Page 186</p> <p>1 Q Do you know how many followers?</p> <p>2 A No.</p> <p>3 Q Or did you know how many followers</p> <p>4 they had in February of 2021?</p> <p>5 A No.</p> <p>6 Q Do you follow CNN Newsroom or the</p> <p>7 Twitter account at CNN Newsroom?</p> <p>8 A I can't say for certain.</p> <p>9 (Exhibit 17 was marked.)</p> <p>10 Q Mr. O'Sullivan, I hand you a copy of a</p> <p>11 document I've marked as Exhibit 17. It's a</p> <p>12 one-page document. It's a tweet from Donie</p> <p>13 O'Sullivan dated June 15, 2021.</p> <p>14 Did you prepare and send this tweet on</p> <p>15 June 15, 2021?</p> <p>16 MS. BOLGER: For the record,</p> <p>17 there's some video referenced in this</p> <p>18 document but it's not there, so I don't know</p> <p>19 what it said.</p> <p>20 THE WITNESS: I think that, yes, I</p> <p>21 would have sent this, yes.</p> <p>22 BY MR. BISS:</p> <p>23 Q Do you know -- addressing Ms. Bolger's</p> <p>24 speaking objection, do you know what the video</p> <p>25 was that you attached to this tweet?</p>	<p style="text-align: right;">Page 188</p> <p>1 Have you ever seen this document</p> <p>2 before today?</p> <p>3 A Yes.</p> <p>4 Q This was included in the original</p> <p>5 complaint.</p> <p>6 A Yeah.</p> <p>7 Q And also the Amended Complaint.</p> <p>8 When you published the February 4,</p> <p>9 2021 report, were you -- did you contemplate that</p> <p>10 it would be viewed by friends of the Flynn family</p> <p>11 or the Flynnns?</p> <p>12 MS. BOLGER: Object to the form.</p> <p>13 THE WITNESS: CNN has a wide</p> <p>14 audience, so it could have been viewed by</p> <p>15 anyone.</p> <p>16 (Exhibit 19 was marked.)</p> <p>17 BY MR. BISS:</p> <p>18 Q Mr. O'Sullivan, I hand you a copy of a</p> <p>19 document. It is marked as Exhibit 19. And this</p> <p>20 is a tweet that you made on July 7, 2020;</p> <p>21 correct?</p> <p>22 A Yes.</p> <p>23 Q You prepared and published this tweet</p> <p>24 using your Twitter account @Donie, D-O-N-I-E?</p> <p>25 A Yeah.</p>
<p style="text-align: right;">Page 187</p> <p>1 A Looks like it is the report that aired</p> <p>2 back in February of '21.</p> <p>3 Q So where would you have gotten this</p> <p>4 attachment to attach it to your tweet? Would you</p> <p>5 have gone to YouTube?</p> <p>6 A Yes.</p> <p>7 Q Do you know how many followers or</p> <p>8 subscribers there are to CNN YouTube channel?</p> <p>9 A No.</p> <p>10 Q When did you first become aware that</p> <p>11 Jack Flynn and Leslie Flynn had sued CNN over</p> <p>12 this report of February 4, 2021?</p> <p>13 A I think it was around March of '21.</p> <p>14 Q Were you provided a copy of the</p> <p>15 complaint?</p> <p>16 A Pretty sure, yeah.</p> <p>17 Q And you read it, I assume?</p> <p>18 A Yeah.</p> <p>19 (Exhibit 18 was marked.)</p> <p>20 Q I hand you a copy of a document that I</p> <p>21 have marked as Exhibit 18. This is a text</p> <p>22 message from Leslie Flynn to Jack Flynn dated --</p> <p>23 I'm not sure where the date is on it --</p> <p>24 February 6, 2021. You can see the date at the</p> <p>25 top there behind -- in front of the timestamp.</p>	<p style="text-align: right;">Page 189</p> <p>1 Q Do you know if anyone at CNN spoke</p> <p>2 with any Flynn family member prior to July 7,</p> <p>3 2020?</p> <p>4 MS. BOLGER: Ever in the history</p> <p>5 of the world, on any topic?</p> <p>6 BY MR. BISS:</p> <p>7 Q Yeah, do you know if anyone at CNN,</p> <p>8 including Marshall Cohen, spoke with any member</p> <p>9 of the Flynn family before July 7, 2020?</p> <p>10 A In relation to the July 4th video?</p> <p>11 Q Yes.</p> <p>12 A I do not know. I know we have, as I</p> <p>13 tweeted there, a response from Sidney Powell.</p> <p>14 Q And do you know whether Mr. Cohen</p> <p>15 spoke with Sidney Powell before he published his</p> <p>16 story?</p> <p>17 A No. I just know what's in the story.</p> <p>18 (Exhibit 20 was marked.)</p> <p>19 Q Mr. O'Sullivan, I hand you a copy of a</p> <p>20 document that I have marked as Exhibit 20. It's</p> <p>21 a two-page document, two tweets. The first tweet</p> <p>22 is a tweet from you dated February 19, 2022, and</p> <p>23 the second one is a tweet from an account, CNN</p> <p>24 This Morning, with an attached video broadcast</p> <p>25 dated February 21, 2022.</p>

<p style="text-align: right;">Page 190</p> <p>1 Did you prepare and send the email on 2 February 19, 2022, the first page? 3 A The tweet? 4 Q Yes. 5 A Yes. 6 Q Did you appear -- who is the anchor 7 who you're appearing with? 8 A That is Brianna Keilar. 9 Q Did you appear with her on the air 10 sometime between February 19 and February 21, 11 2022 to discuss matters relating to QAnon? 12 A Certainly seems like that, yeah. That 13 should be accurate, yeah. 14 Q I just want to ask you about this. 15 By February of 2022, had you -- in the 16 course of your investigations, had you uncovered 17 any evidence that would suggest that General 18 Flynn was a person or the person behind QAnon? 19 A No. 20 Q Who are the linguists? On the first 21 page of this exhibit in your tweet, who are the 22 linguists? 23 A It's a reference to a New York Times 24 story where they spoke to some linguists, I don't 25 recall who, but it would be in the story that's</p>	<p style="text-align: right;">Page 192</p> <p>1 you remember doing a report titled or -- titled 2 We Are Q and relating to the origin of the QAnon 3 slogan WWG1WGA? 4 A I remember this report, yes. It was 5 prior to a wider report. 6 Q The second page, your tweet of June 6, 7 2022, in terms of your investigation, your wider 8 investigation into the origins of the slogan, 9 what you've called the QAnon slogan, WWG1WGA, you 10 determined that it wasn't something from the back 11 of a boat that was owned at some point by John F. 12 Kennedy? 13 A Yeah. According to the Kennedy 14 library. But I should point out, you know, we 15 did this report -- this was part of a wider 16 report that was published in June of 2022, where 17 we got in the bit about a slogan, but it had been 18 reported by others, I think many others, well 19 prior to that, about the Kennedy -- it not being 20 associated with Kennedy. 21 Q At least by June of 2022, you had 22 determined that the slogan was not associated 23 with Kennedy? 24 A Oh, yeah. Long before that, it was 25 known.</p>
<p style="text-align: right;">Page 191</p> <p>1 linked. 2 Q Did you make any effort to contact 3 those linguists or did you rely on the New York 4 Times? 5 A I don't recall. 6 Q Did you ever determine that Ron 7 Watkins and Paul Ferber were the two men likely 8 behind QAnon? 9 A I think both of them denied it. 10 (Exhibit 21 was marked.) 11 Q Mr. O'Sullivan, I hand you a copy of a 12 document I have marked as Exhibit 21. This is a 13 three-page document. The first is a tweet from 14 the @CNN account dated June 6, 2022. The second 15 one is a tweet from yourself dated June 6, 2022. 16 And the third page is another version of a tweet 17 from yourself, dated June 6, 2022. Here's my 18 question with regard to these: 19 MS. BOLGER: You created this 20 exhibit by putting three separate tweets 21 together? 22 MR. BISS: That's right. That's 23 right. 24 BY MR. BISS: 25 Q So, Mr. O'Sullivan, the first one, do</p>	<p style="text-align: right;">Page 193</p> <p>1 Q So at least by June 6, 2022, you knew 2 that the slogan in fact came from the Ridley 3 Scott movie White Squall? 4 A Yes. 5 Q With Jeff Bridges? 6 A I haven't watched it all. 7 Q You haven't watched the movie? 8 A No. 9 Q Didn't you call it a QAnon movie or 10 hashtag QAnon movie? 11 A It was from the '90s, before QAnon. 12 Q Had you ever known a QAnon follower 13 refer to it as a QAnon movie? 14 A I don't think so. 15 Q Did they adopt it as their rallying 16 cry? 17 MS. BOLGER: Objection to form. 18 THE WITNESS: I think what 19 happened was -- what happened was that the 20 slogan "Where we go one, we go all" was from 21 that movie. And I think in the exhibit 22 there you have, you have the bell, which is 23 in the movie, a screenshot of it. A lot of 24 QAnon followers, supporters, people in that 25 world mistakenly thought it was from a boat,</p>

<p style="text-align: right;">Page 194</p> <p>1 a John F. Kennedy boat, as was repeated by 2 Sidney Powell when she tried to deny that 3 the July 4, 2020 Flynn video had anything to 4 do with QAnon. Of course, that turned out 5 to be false. 6 BY MR. BISS: 7 Q Sidney Powell's statement to the 8 Washington Examiner, would you characterize it as 9 misinformation or disinformation? 10 MS. BOLGER: Object to the form. 11 BY MR. BISS: 12 Q You know what disinformation is? 13 A I do, yeah. 14 Q Fair. 15 A What's that? 16 Q You're well aware of the difference 17 between -- 18 A I am, yes. 19 Q -- misinformation and disinformation? 20 A Yeah. 21 Q Would you characterize Sidney Powell's 22 statements to the Washington Examiner as 23 misinformation or disinformation? 24 MS. BOLGER: Well, first of all, 25 you don't know what he thinks misinformation</p>	<p style="text-align: right;">Page 196</p> <p>1 The Lead -- the account The Lead CNN. It's about 2 a report that was published in September of 2022 3 on far right extremism. 4 Do you remember publishing that 5 report? 6 A It's hard to tell just by the chyron 7 and the screenshot, but I think it's related 8 potentially to what some people described as a 9 QAnon song being played at a Trump rally. But I 10 can't say for certain. 11 Q Were you aware that as of 12 September 2022, the FBI was still calling QAnon a 13 far right extremist group? 14 MS. BOLGER: Object to the form. 15 THE WITNESS: I don't recall. 16 Sorry. 17 (Exhibit 23 was marked.) 18 BY MR. BISS: 19 Q Mr. O'Sullivan, I hand you a copy of a 20 document I've marked as Exhibit 23. And this is 21 a two-page document. The first page is a tweet 22 from CNN This Morning dated April 19, 2021. The 23 second page is the same tweet, but a different 24 time of the tweet. 25 Here's my question on this document:</p>
<p style="text-align: right;">Page 195</p> <p>1 is or what he thinks disinformation is. So 2 if you're going to ask him, you need to ask 3 him to define those terms. 4 BY MR. BISS: 5 Q Define disinformation. 6 A Speaks to intent. Falsely 7 manufactured, so they know it's false. 8 MS. BOLGER: He's not done 9 answering. 10 Go ahead. 11 THE WITNESS: Misinformation then 12 can be passed along by somebody who thinks 13 it's true, but it's false. But 14 misinformation -- yeah, so I couldn't speak 15 to Sidney Powell's intent, whether she was 16 deliberately trying to mislead people. 17 BY MR. BISS: 18 Q You don't know if it was 19 disinformation, but you can say definitively in 20 your view it's misinformation? 21 A It's certainly false, according to the 22 Kennedy Presidential Library, yeah. 23 (Exhibit 22 was marked.) 24 Q I hand you a copy of a document that 25 I've marked as Exhibit 22. This is a tweet from</p>	<p style="text-align: right;">Page 197</p> <p>1 Do you remember doing a report on the Passion of 2 Christ star pushing false QAnon conspiracy 3 theories? 4 MS. BOLGER: Just for the record, 5 these are screen grabs of the tweets. It's 6 where Mr. Biss chose to stop it. 7 BY MR. BISS: 8 Q She's right, I chose to stop it and -- 9 the first one with you -- at the very beginning 10 with you and the chyron and some more 11 descriptions of what the report was all about. I 12 chose to stop the second one with the picture of 13 the Passion of Christ guy. 14 With regard to the first page, do you 15 remember doing a report on the Passion of Christ 16 star spreading baseless QAnon conspiracy theories 17 at a right wing convention? 18 A I remember doing this report, but I 19 can't say I remember all the specifics of it. 20 Q Who was the Passion of Christ guy? 21 What was his name? 22 A I think it's in the chyron there. 23 It's in the chyron. 24 Q It says, "Passion of Christ star." 25 MS. BOLGER: Underneath it it</p>

<p style="text-align: right;">Page 198</p> <p>1 says, "Jim Caviezel, actor." Second page. 2 BY MR. BISS: 3 Q Okay. Gotcha. Okay. Do you 4 remember, what was the baseless conspiracy theory 5 that Mr. Caviezel was spreading? 6 MS. BOLGER: Object to form. 7 THE WITNESS: I don't recall. 8 BY MR. BISS: 9 Q Do you remember that this guy was the 10 guy who believed that if you got the kids riled 11 up enough, like really get them riled up, get 12 them really angry, their adrenaline goes through 13 the roof? If you get them into an ADHD mode and 14 then you kill them and you drink their blood, 15 that that's somehow going to allow you to achieve 16 immortality or total consciousness as Bill Murray 17 said in Caddy Shack? 18 MS. BOLGER: Object to form. 19 Q Do you remember that is what 20 Caviezel's belief was? 21 A Now that you reminded me, that sounds 22 familiar. 23 Q He was the adrenochrome guy? 24 MS. BOLGER: Object to the form. 25</p>	<p style="text-align: right;">Page 200</p> <p>1 and whatnot, but adrenochrome, that one -- 2 again -- 3 Q That would make front page news if a 4 member of the Flynn family started talking about 5 killing kids and drinking blood and stuff? That 6 would be New York Times' first page? 7 A It may. 8 (Exhibit 24 was marked.) 9 Q Mr. O'Sullivan, I hand you a copy of a 10 document we marked Exhibit 24. It is House 11 Resolution 1094, a resolution that was sponsored, 12 among others, by Denver Riggleman. It's a 13 resolution that is titled Condemning QAnon and 14 Rejecting the Conspiracy Theories it Promotes, 15 dated August 25, 2020. 16 Have you ever seen this document 17 before? 18 A I'm aware of this. 19 Q Prior to the publication of the report 20 on February 4, 2021, were you aware that Congress 21 had condemned QAnon and rejected the conspiracy 22 theories it promotes? 23 A I believe so. 24 Q Did you read a copy of this House 25 resolution before February 4, 2021?</p>
<p style="text-align: right;">Page 199</p> <p>1 BY MR. BISS: 2 Q Did you ever refer to him as the 3 adrenochrome guy? 4 A I don't know. 5 Q Isn't it true, Mr. O'Sullivan, that 6 one of the core tenets of the QAnon belief system 7 was that these Democrats, elitists and others, 8 including Tom Hanks and various other people who 9 we heard about, one of the core tenets was they 10 would get all the kids riled up so their 11 adrenaline levels went through the roof and then 12 they would kill them and drink their blood? That 13 was one of the core tenets of the QAnon belief 14 system; correct? 15 MS. BOLGER: Object to form. 16 THE WITNESS: It was a belief by 17 some QAnon supporters, but I wouldn't say 18 all. 19 BY MR. BISS: 20 Q And it's true that you have never in 21 your lifetime heard any member of the Flynn 22 family espouse any of those kinds of radical -- 23 what I'll call crazy beliefs? 24 A Just as we report in the piece for the 25 Flynn's, evidence of them sharing QAnon slogans</p>	<p style="text-align: right;">Page 201</p> <p>1 A I don't recall. I certainly was aware 2 of it. 3 Q Turn to the second page of the 4 document. The whereas clause at the top says, 5 "Whereas many QAnon followers express 6 anti-Semitic views and the Anti-Defamation League 7 has said that the movement's central conspiracy 8 theory includes anti-Semitic elements," it goes 9 on; do you see that? 10 A Yes. 11 Q Have you ever seen any evidence that 12 any member of the Flynn family has ever expressed 13 any anti-Semitic views? 14 MS. BOLGER: Object to form for 15 lots of reasons. 16 THE WITNESS: We didn't allege 17 that in our report. This determination by 18 the Anti-Defamation League, you know, it's 19 the Anti-Defamation League's determination, 20 view. Certainly CNN has reported a bit how 21 there's anti-Semitic elements to QAnon, 22 but -- 23 BY MR. BISS: 24 Q So have you ever even any evidence 25 that the Flynn's expressed any anti-Semitic views,</p>

<p style="text-align: right;">Page 202</p> <p>1 ever?</p> <p>2 MS. BOLGER: Objection to form.</p> <p>3 THE WITNESS: We didn't allege</p> <p>4 that in our piece.</p> <p>5 BY MR. BISS:</p> <p>6 Q Didn't ask you that.</p> <p>7 MS. BOLGER: Hey. Don't interrupt</p> <p>8 Donie. Let him answer the question.</p> <p>9 THE WITNESS: We didn't allege</p> <p>10 that in our piece. What we reported on was</p> <p>11 they were -- had taken the QAnon oath and</p> <p>12 posted it publicly, and that's what we</p> <p>13 reported.</p> <p>14 BY MR. BISS:</p> <p>15 Q I'm going to give you one final chance</p> <p>16 to answer it. We'll put it on the list for the</p> <p>17 judge.</p> <p>18 Have you ever seen any evidence that</p> <p>19 the Flynns ever expressed any anti-Semitic views,</p> <p>20 ever?</p> <p>21 MS. BOLGER: Objection, asked and</p> <p>22 answered.</p> <p>23 BY MR. BISS:</p> <p>24 Q And it's a yes or no question.</p> <p>25 MS. BOLGER: It doesn't have to be</p>	<p style="text-align: right;">Page 204</p> <p>1 by overwhelming anti-trafficking hotlines with</p> <p>2 false reports," and it goes on.</p> <p>3 Do you see that?</p> <p>4 A Yes.</p> <p>5 Q Do you know of or have you ever seen</p> <p>6 any evidence that any Flynn family member ever</p> <p>7 made any false reports to any anti-trafficking</p> <p>8 hotline?</p> <p>9 A No. I would just say in the context</p> <p>10 of QAnon in this anti-trafficking hotlines and</p> <p>11 children's rights groups, there's -- I think I</p> <p>12 have done some reporting on it, but it's been</p> <p>13 pretty widely reported how, because QAnon -- a</p> <p>14 lot of QAnon pushes this idea, that children are</p> <p>15 being abused, and that you can't trust the</p> <p>16 institutions that are currently charged with</p> <p>17 caring for children, that a lot of people, some</p> <p>18 QAnon followers, are -- you know, even tried to</p> <p>19 disrupt the works of actual services that are</p> <p>20 helping children. So, again, it just kind of</p> <p>21 goes back to the point of the importance of, you</p> <p>22 know, when public figures are engaging or</p> <p>23 signaling or flirting with this, it can have a</p> <p>24 lot of unintended consequences.</p> <p>25 (Exhibit 25 was marked.)</p>
<p style="text-align: right;">Page 203</p> <p>1 a yes or no question. You can answer</p> <p>2 truthfully, as you choose.</p> <p>3 THE WITNESS: I don't believe that</p> <p>4 I have seen that evidence, but I would point</p> <p>5 out that we didn't claim that. We simply</p> <p>6 reported that they had taken a QAnon oath.</p> <p>7 BY MR. BISS:</p> <p>8 Q The Anti-Defamation League, have you</p> <p>9 ever -- before publication on February 4, 2021,</p> <p>10 did you ever review any reports or any statements</p> <p>11 published by the Anti-Defamation League</p> <p>12 concerning QAnon?</p> <p>13 A I may have, yes.</p> <p>14 Q Is it true -- as Congress says here,</p> <p>15 is it true that the Anti-Defamation League said</p> <p>16 that the movement, QAnon movement's central</p> <p>17 conspiracy theory includes anti-Semitic elements?</p> <p>18 A I can't say for sure, but that</p> <p>19 certainly sounds consistent with the</p> <p>20 Anti-Defamation League's research in this area.</p> <p>21 Q If you turn to the third page of the</p> <p>22 House resolution, there's a whereas clause, the</p> <p>23 fourth one, that reads, "Whereas QAnon adherents</p> <p>24 have been harming legitimate efforts to combat</p> <p>25 child exploitation and sex trafficking, including</p>	<p style="text-align: right;">Page 205</p> <p>1 Q I'll show you what I've marked as</p> <p>2 Exhibit 25. This is a document published by the</p> <p>3 Office of the Director of National Intelligence</p> <p>4 titled Domestic Violent Extremism Poses</p> <p>5 Heightened Threat in 2021.</p> <p>6 Have you ever seen this document</p> <p>7 before?</p> <p>8 A I can't say for sure.</p> <p>9 Q Do you know what a domestic violent</p> <p>10 extremist is?</p> <p>11 MS. BOLGER: What he thinks or</p> <p>12 what Donie and I think?</p> <p>13 MR. BISS: What he thinks.</p> <p>14 THE WITNESS: I think it would</p> <p>15 depend on the context. So in this case,</p> <p>16 ODNI have a definition for themselves.</p> <p>17 BY MR. BISS:</p> <p>18 Q Page 3 they have a definition. Here's</p> <p>19 what they say: "For the purposes of this</p> <p>20 assessment, the IC" -- that means intelligence</p> <p>21 community -- "defines a DVE" -- that's a domestic</p> <p>22 violent extremist -- "as an individual based and</p> <p>23 operating primarily in the United States, without</p> <p>24 direction or inspiration from a foreign terrorist</p> <p>25 group or other foreign power, and who seeks to</p>

<p style="text-align: right;">Page 206</p> <p>1 further political or social goals wholly or in 2 part through unlawful acts of force or violence." 3 You see that? 4 A Yes. 5 Q Were you aware that the FBI and 6 Department of Homeland Security had referred to 7 QAnon as a domestic violent extremist group? 8 MS. BOLGER: In this March 2021 9 report? 10 MR. BISS: No. No. 11 BY MR. BISS: 12 Q Are you aware that the FBI and the 13 Department of Homeland Security identified QAnon 14 as being a DVE? 15 MS. BOLGER: In this report or 16 otherwise? 17 MR. BISS: Not in this report. I 18 would say that if that was my question. 19 BY MR. BISS: 20 Q Are you aware that they had referred 21 to QAnon as a domestic violent extremist group? 22 A I recall the FBI had said something, 23 but I do not know if it was this, if it matches 24 the definition that's outlined in this March 2021 25 report.</p>	<p style="text-align: right;">Page 208</p> <p>1 the question. 2 THE WITNESS: No. 3 BY MR. BISS: 4 Q In this video Charlie Chester, CNN 5 technical director, admitted on tape, quote, "If 6 the agenda is, say, to get Matt Gaetz, he's a 7 problem for the Democratic party, we're going to 8 keep running these stories to keep hurting him. 9 If we keep pushing that, it's helping us." 10 MS. BOLGER: For the record, 11 Mr. Biss did not read the ellipses in 12 different places. 13 BY MR. BISS: 14 Q Was your report of February 4, 2021 15 part of an agenda to get General Flynn and 16 President Trump? 17 A No. 18 (Exhibit 27 was marked.) 19 Q I'll show you a document that I have 20 marked as Exhibit 27. And this is a notice 21 published by Project Veritas, again relating to 22 the Charlie Chester, CNN technical director of 23 video. And in the notice published by Ifrah Law 24 dated July 21, 2022, the author states, "A CNN 25 employee was filmed discussing the defendant's</p>
<p style="text-align: right;">Page 207</p> <p>1 (Exhibit 26 was marked.) 2 Q Okay. Mr. O'Sullivan, I hand you a 3 copy of a document. It's a one-page document 4 which consists of a video and Instagram post by 5 Project Veritas. And in the -- have you seen 6 this video titled #EXPOSECNN? 7 A I think I might have watched parts of 8 it, but I can't say for sure. 9 Q Are you aware that CNN targeted Matt 10 Gaetz, Congressman Matt Gaetz? 11 MS. BOLGER: Object to the form of 12 the question. 13 BY MR. BISS: 14 Q As admitted by Charlie Chester, CNN 15 technical director? 16 A That sounds a bit familiar. 17 Q Are you aware that CNN, as a routine 18 business practice, targets Republicans? 19 A No. 20 MS. BOLGER: Object to the form of 21 the question. 22 BY MR. BISS: 23 Q And publishes propaganda about those 24 Republicans? 25 MS. BOLGER: Object to the form of</p>	<p style="text-align: right;">Page 209</p> <p>1 coverage of the 2020 presidential election. The 2 employee boasted that CNN helped to defeat 3 President Trump in the 2020 election and called 4 the defendant, his employer, propaganda." 5 Were you aware that Mr. Chester 6 referred to CNN as propaganda? 7 A I don't recall. 8 MS. BOLGER: Objection. This 9 appears to be a text message from Mr. Flynn 10 that is about CNN and therefore would have 11 been responsive to our document requests. 12 It was not produced to us. 13 MR. BISS: That's an improper 14 speaking objection and you know that. 15 MS. BOLGER: There's no pending 16 question. I waited until there was no 17 pending question to tell you that this 18 question was from Mr. Flynn's text messages. 19 It should have been produced to us before 20 now. 21 MR. BISS: It was produced to you. 22 MS. BOLGER: It was not. There's 23 no Bates number. 24 MR. BISS: Maybe I just got it 25 from the internet.</p>

<p style="text-align: right;">Page 210</p> <p>1 MS. BOLGER: Maybe, but if it is 2 in Mr. Flynn's custody, I'm entitled to it. 3 MR. BISS: You've got it already. 4 MS. BOLGER: I don't think we do, 5 for the record. 6 BY MR. BISS: 7 Q Here's my question for you: Was this 8 February 4, 2021 report propaganda? 9 A No. 10 Q About the violent extremists QAnon who 11 were a prominent part of the January 6 mob, 12 published within a week of the second impeachment 13 trial? 14 MS. BOLGER: Object to the form. 15 Was there a question? 16 BY MR. BISS: 17 Q Yeah. Isn't that what this report 18 was, viewed in context? 19 MS. BOLGER: Object to form. 20 BY MR. BISS: 21 Q A propaganda effort by CNN? 22 A No. 23 (Exhibit 28 was marked.) 24 Q I hand you a copy of a document, a 25 one-page document marked as Exhibit 28.</p>	<p style="text-align: right;">Page 212</p> <p>1 was their hero, you know, they wanted to be 2 digital soldiers. And I believe some Q posts 3 started referencing digital soldiers, so there 4 was that kind of feedback going on. 5 Q You would agree with me that a lot of 6 people in the QAnon movement had a lot of 7 different heroes? 8 A Yeah. I think Trump and Flynn would 9 have been the more prominent of the heroes. 10 Q Have you ever done any research to 11 determine who the QAnon heroes are? 12 MS. BOLGER: Object to the form. 13 THE WITNESS: Through my 14 reporting, yes. 15 BY MR. BISS: 16 Q Who are all the QAnon heroes? 17 A As I just said, I think Michael Flynn 18 and Trump are two of the main heroes. 19 Q Any others? 20 A They're certainly the two most 21 prominent. 22 Q Can you think of any others, sitting 23 here today? You're a top expert here. You've 24 been writing stuff on QAnon for years. Who are 25 the other heroes? They have to have other</p>
<p style="text-align: right;">Page 211</p> <p>1 When was the first time you ever heard 2 of the phrase "digital soldiers"? 3 A I don't recall. 4 Q Have you done any investigation or 5 research to determine the origin of the phrase? 6 A I think it was something that General 7 Michael Flynn said, and I think even -- I think 8 it was before the QAnon -- before QAnon had got 9 going, but digital soldiers then became -- QAnon 10 very much adopted that as a thing they would 11 describe themselves as because they were big 12 Flynn fans. A lot of them. 13 Q So if CNN -- so whatever phrase 14 QAnon -- the QAnon movement adopts, is it your 15 testimony that that's a QAnon slogan? 16 A No. 17 Q So it's just some of the ones that 18 they adopt. Is "digital soldiers" a QAnon 19 slogan? 20 A I would say "Where we go one, we go 21 all" is a QAnon slogan. "Digital soldiers" is, 22 you know, it's definitely something they adopted, 23 but I wouldn't say -- necessarily say a slogan, 24 but it definitely became, you know, for many 25 QAnon followers, because General Michael Flynn</p>	<p style="text-align: right;">Page 213</p> <p>1 heroes. 2 MS. BOLGER: Object to form. 3 THE WITNESS: Do they have to have 4 other heroes? 5 BY MR. BISS: 6 Q Yeah. 7 A Why? 8 Q You can't just have two. 9 A You can't? 10 Q No. In any event, you can't think of 11 any other heroes that the QAnon movement has, at 12 least sitting here today; correct? 13 A Trump and Flynn are the most 14 prominent, I would say. 15 Q What about Devin Nunes? 16 A There's a lot of folks, a lot of 17 Republicans, I suppose, that some people who 18 follow QAnon can be a fan of, but he doesn't 19 feature in such a prominent way. 20 Q How about Kevin McCarthy? 21 A I don't think so, but I can't say for 22 certain. 23 (Exhibit 29 was marked.) 24 Q So Mr. O'Sullivan, I hand you a copy 25 of a document marked Exhibit 29. This is a copy</p>

<p style="text-align: right;">Page 214</p> <p>1 of a document produced in discovery in this case</p> <p>2 from Jack Flynn's Instagram account, and it is a</p> <p>3 repost of a -- what do you call them on</p> <p>4 Instagram? Are they posts?</p> <p>5 A Yeah.</p> <p>6 Q It's a repost of a post on Instagram</p> <p>7 by an account called The Liberal Purge.</p> <p>8 A The Liberal Purge.</p> <p>9 Q Liberal Purge.</p> <p>10 This repost is dated October 11, 2018,</p> <p>11 4:41 p.m. You'll see it references hashtag</p> <p>12 WWG1WGA U.S.</p> <p>13 Do you see that?</p> <p>14 A Yes.</p> <p>15 Q And it looks like -- what are those</p> <p>16 things called, emojis?</p> <p>17 A Yes.</p> <p>18 Q And what's that one? Is that laughing</p> <p>19 or crying emoji; can you tell me?</p> <p>20 A Looks like a smiley emoji, I guess.</p> <p>21 Q It's got tears out of its eyes. It's</p> <p>22 laughing so hard it's crying. That's the name of</p> <p>23 the -- laughing so hard it's crying?</p> <p>24 A It can be used in that context, yeah.</p> <p>25 Q You see it looks like a smiley face</p>	<p style="text-align: right;">Page 216</p> <p>1 Don't answer a question that calls</p> <p>2 for speculation.</p> <p>3 THE WITNESS: I don't want to</p> <p>4 speculate.</p> <p>5 BY MR. BISS:</p> <p>6 Q Taylor Swift Special; see that?</p> <p>7 A Uh-huh.</p> <p>8 Q You think that's funny?</p> <p>9 A Not particularly.</p> <p>10 Q I think it's really funny. Hence the</p> <p>11 emoji.</p> <p>12 A How would you explain, then, the</p> <p>13 "Where we go one, we go all" hashtag?</p> <p>14 Q Well, it's not his. It's somebody</p> <p>15 else's. That's what you don't get about the</p> <p>16 judge's opinion. That's what you don't -- you're</p> <p>17 ignoring and I know you're deliberating ignoring</p> <p>18 it.</p> <p>19 MS. BOLGER: Object to the form.</p> <p>20 You're not here to criticize the witness and</p> <p>21 you're not here to fight with the witness.</p> <p>22 Don't do it again.</p> <p>23 MR. BISS: Okay.</p> <p>24 BY MR. BISS:</p> <p>25 Q Let me rephrase.</p>
<p style="text-align: right;">Page 215</p> <p>1 with tears coming out of its eyes?</p> <p>2 A Yes.</p> <p>3 Q So is this an example of what you told</p> <p>4 me before, Jack Flynn is a QAnon follower because</p> <p>5 he's reposted or retweeted or re-whatever the</p> <p>6 QAnon slogan?</p> <p>7 MS. BOLGER: Object to the form.</p> <p>8 BY MR. BISS:</p> <p>9 Q Does this support your testimony that</p> <p>10 he's a QAnon follower?</p> <p>11 A Certainly it seems to be another</p> <p>12 instance of where he is sharing something that</p> <p>13 references the QAnon slogan, yes.</p> <p>14 Q Why did Jack Flynn repost this to his</p> <p>15 Instagram followers?</p> <p>16 MS. BOLGER: Objection to form.</p> <p>17 That would be speculation.</p> <p>18 Don't speculate.</p> <p>19 BY MR. BISS:</p> <p>20 Q Do you know?</p> <p>21 A I don't want to speculate.</p> <p>22 Q Do you think maybe he reposted it</p> <p>23 because he thought it was funny?</p> <p>24 MS. BOLGER: Calls for</p> <p>25 speculation.</p>	<p style="text-align: right;">Page 217</p> <p>1 Just because Jack Flynn reposted</p> <p>2 something from The Liberal Purge, and The Liberal</p> <p>3 Purge used the phrase "Where we go one, we go</p> <p>4 all," is it really your testimony that this</p> <p>5 repost makes Jack Flynn a QAnon follower?</p> <p>6 MS. BOLGER: Objection to the</p> <p>7 form. I don't know that you're correctly</p> <p>8 characterizing this exhibit.</p> <p>9 You can answer the question.</p> <p>10 THE WITNESS: We didn't call him a</p> <p>11 QAnon follower. This would be another</p> <p>12 instance, yes, of where Jack Flynn just</p> <p>13 appears again to be sharing something that</p> <p>14 happens to have a QAnon logo on it and it</p> <p>15 fits into, obviously, a pattern of sharing</p> <p>16 QAnon slogans and memes over a long period</p> <p>17 of time. Of course, appearing in a video</p> <p>18 taking the QAnon pledge. So this is -- yes,</p> <p>19 it's another example of the slogan being</p> <p>20 reshared.</p> <p>21 BY MR. BISS:</p> <p>22 Q Is it your testimony that any time, no</p> <p>23 matter what the content of the repost, any time</p> <p>24 that you include the words or the letters</p> <p>25 WWG1WGA, any time you use those letters in that</p>

<p style="text-align: right;">Page 218</p> <p>1 order, that that will subject you to being 2 accused of being a QAnon follower? 3 MS. BOLGER: Object to the form. 4 BY MR. BISS: 5 Q No matter what the content of the 6 repost is? 7 MS. BOLGER: Let him answer. 8 THE WITNESS: Again, I would not 9 characterize Jack Flynn as a QAnon follower. 10 And I think you need to look at the post in 11 the broader context. Context being the 12 person who took the QAnon oath. 13 (Exhibit 30 was marked.) 14 BY MR. BISS: 15 Q All right, sir. 16 Mr. O'Sullivan, I hand you a copy of a 17 document that I have marked as Exhibit 30. This 18 is a series of tweets and retweets that were 19 published by Jack Flynn on July 4, 2020 at 20 various times. I want to go through them in 21 order. Some of these were produced from the 22 Wayback Machine, hence the web archive.org 23 statement at the top. So the very first page -- 24 MS. BOLGER: Can I interrupt? I'm 25 not sure -- some of these are Jack Flynn,</p>	<p style="text-align: right;">Page 220</p> <p>1 MS. BOLGER: Object to the 2 question. Calls for speculation. 3 Don't speculate; only testify to 4 what you know. 5 BY MR. BISS: 6 Q Do you know why? 7 A I suspect it has something to do with 8 his brother. 9 Q Okay. Leaving this here, God Bless 10 America, hashtag KAG2020. Is it your view that 11 God Bless America is a hashtag slogan? 12 MS. BOLGER: Object to the form. 13 It's not a hashtag. 14 BY MR. BISS: 15 Q Is it your view that God Bless America 16 is a QAnon slogan? 17 A No. 18 Q Do you know what the hashtag KAG2020 19 means? 20 A No. 21 Q Have you ever heard of the phrase 22 "keep America great"? 23 A Yes. 24 Q You want to keep America great, don't 25 you?</p>
<p style="text-align: right;">Page 219</p> <p>1 but a lot of these are not. 2 MR. BISS: Please follow along. 3 MS. BOLGER: So actually I will 4 tell you that none -- most of these are not 5 dated. If you're making a representation 6 that it's the 4th of July, that's fine, but 7 many of them are not dated. 8 MR. BISS: Which, many of what? 9 MS. BOLGER: Many of the tweets 10 are not dated. 11 MR. BISS: When we get there, make 12 sure you remind me -- to one that doesn't 13 have a date on it. 14 BY MR. BISS: 15 Q The first page, Mr. O'Sullivan, is a 16 tweet from Jack Flynn hashtag Sign the Damn 17 Dismissal, dated July 4, 2020 at 7:50 p.m. 18 Do you see that? 19 A Hashtag Sign the Damn Dismissal isn't 20 his user name. 21 Q Hashtag Sign the Damn Dismissal is a 22 QAnon slogan? 23 A Not that I'm aware. 24 Q Do you know why Jack Flynn put in his 25 handle hashtag Sign the Damn Dismissal?</p>	<p style="text-align: right;">Page 221</p> <p>1 MS. BOLGER: That's an ambiguous 2 question. I object on ridiculousness 3 grounds. 4 BY MR. BISS: 5 Q Does CNN want to keep America great? 6 MS. BOLGER: Don't answer the 7 question. 8 Steven, ask a question that's 9 helpful in any way. 10 BY MR. BISS: 11 Q Is the phrase "keep America great" a 12 QAnon phrase? 13 A Not that I'm aware. 14 Q You'll see that there's a picture of 15 General Flynn with the words The Great Awakening 16 and what appears to be some letters and numbers 17 and what have you. Is any portion of that 18 picture a QAnon picture? 19 A QAnon followers have referenced The 20 Great Awakening quite a bit. 21 Q Is that a core tenet of the QAnon 22 belief system? 23 MS. BOLGER: Object to the form. 24 THE WITNESS: It's a common 25 belief, but, you know, as I said earlier,</p>

<p style="text-align: right;">Page 222</p> <p>1 the core tenets are difficult to pin down. 2 They evolve. The one kind of consistent 3 thing has always been the "Where we go one, 4 we go all" slogan. But The Great Awakening, 5 based on my reporting, would be one of the 6 more frequently used terms or phrases. 7 BY MR. BISS: 8 Q In terms of what? 9 A Shared by people in the QAnon 10 community. 11 Q Do you know why Jack Flynn tweeted 12 that picture with the words "God bless America 13 KAG2020"? 14 MS. BOLGER: Object to the form. 15 Calls for speculation. Of course he doesn't 16 know what was in Mr. Flynn's head. 17 MR. BISS: Kate, why are you 18 setting yourself up like this? You're 19 telling him what to say. You're interfering 20 with the deposition. 21 MS. BOLGER: Do you have a 22 question? Because you're wasting our time. 23 BY MR. BISS: 24 Q Do you know why Jack Flynn tweeted the 25 statements with the picture on July 4, 2020?</p>	<p style="text-align: right;">Page 224</p> <p>1 BY MR. BISS: 2 Q Do you know why Jack Flynn put that in 3 quotes? 4 MS. BOLGER: Object to form. 5 Calls for speculation. 6 THE WITNESS: No. 7 BY MR. BISS: 8 Q What's a digital soldier? 9 A Depends who you ask, I guess. 10 Q I'm sitting in a room with you. I'd 11 kind of like to know what your definition is. 12 A Yeah, I think General Michael Flynn 13 brought up digital soldiers -- well, I can't 14 speak specifically to what Flynn has in his mind. 15 I think for a lot of QAnon followers, QAnon 16 supporters, it's keyboard warriors basically. 17 They kind of think that, you know, we'll stay 18 online all day and start posting memes and 19 posting slogans and we're helping save America. 20 They view that as -- themselves as being digital 21 soldiers. 22 Q Do you remember what General Flynn 23 said about digital soldiers? 24 A I don't recall now. 25 Q He said it's a citizen journalist.</p>
<p style="text-align: right;">Page 223</p> <p>1 A I couldn't speak to what was going on 2 in his mind, but it's notable that of all the 3 images and phrases that were chosen to share 4 here, it's including this reference of The Great 5 Awakening, which is -- you know, would be 6 familiar to many QAnon followers. 7 Again, if you look at it in the 8 broader context of the video that was also 9 published on the 4th of July of the Flynn's taking 10 the QAnon oath and other multiple instances where 11 Jack Flynn shared QAnon slogans. So it's 12 notable. 13 Q The next tweet, Page 2, is at 14 7:53 p.m. on July 4. Jack Flynn wrote, quote, 15 "We have an army of digital soldiers." 16 Is that a QAnon phrase? 17 A The term "digital soldiers" is 18 something that has been adopted by many fans of 19 QAnon. So it would be familiar to them, yes. 20 Q So is the phrase "We have an army of 21 digital soldiers," is that a QAnon quote? 22 MS. BOLGER: Object to the form. 23 THE WITNESS: I wouldn't 24 characterize it as such. 25</p>	<p style="text-align: right;">Page 225</p> <p>1 You're not against citizen journalists, are you? 2 MS. BOLGER: Objection. I don't 3 think that's an accurate quote, but you can 4 answer. 5 THE WITNESS: As a concept? 6 BY MR. BISS: 7 Q Yeah. 8 A I think citizen journalism is a good 9 thing. What's not good is a lot of followers of 10 QAnon, they find themselves -- they quote/unquote 11 do their own research and, unfortunately, that 12 research happens in kind of dark corners of the 13 internet, where people are exposed to a lot of 14 conspiracy theories that you've outlined earlier 15 today. And so that is sometimes where I think 16 people's, you know, motivations and efforts are 17 misplaced. 18 Q All right. Have you -- other than 19 General Flynn, have you ever heard any Flynn 20 family member use the phrase "digital soldiers"? 21 A Well, in this exhibit it shows Jack. 22 I recall I think, you know, there's merchandise 23 and things that the Flynn's are selling, websites 24 that have been linked from Flynn pages that had 25 merchandise that the Flynn's are selling.</p>

<p style="text-align: right;">Page 226</p> <p>1 Q The hashtag Silent No More, is that a 2 QAnon hashtag? 3 A Not that I'm aware. 4 Q Do you know what Jack Flynn was 5 intending when he wrote "Silent No More"? 6 A I don't. 7 Q In the picture there is General Flynn. 8 Do you know what war he was engaged in in the 9 service for the United States of America when 10 that picture was taken? 11 A I do not. 12 Q Do you know how many times General 13 Flynn has been in combat in defense of the United 14 States of America? 15 A Specific times, no. 16 Q Do you know how many medals 17 commendations he's been awarded over the years? 18 A I'm aware he has received some, yes. 19 Q Are you aware of the security 20 clearances he has held over the years? 21 A Not specifically. 22 Q And you were aware, though, at one 23 point in time he became a director of national 24 intelligence; right? 25 MS. BOLGER: Object to the form.</p>	<p style="text-align: right;">Page 228</p> <p>1 in the transcript. 2 MS. BOLGER: That's great. 3 BY MR. BISS: 4 Q Let's go to the next page. This is 5 8:44 p.m., July 4, 2020. Jack Flynn writes, 6 "Happy Independence Day." You see that? 7 A Yes. 8 Q Is that a QAnon phrase? 9 A No. 10 Q And he writes WWG1WGA. You say that's 11 a QAnon slogan? 12 A It is, yes. 13 Q He writes KAG2020, which you said you 14 didn't know what that is? 15 A You told me it's keep America great. 16 Q Yeah, it is. Keep America great. 17 Do you have any knowledge or 18 understanding as to why Jack Flynn wrote this 19 tweet? It looks like he tweeted out a copy of 20 the video on the 4th of July at 8:44 p.m. Do you 21 know why Jack Flynn did that? 22 MS. BOLGER: Objection to form. 23 Calls for speculation. 24 THE WITNESS: I can't speak to 25 what was in his mind, but obviously he's</p>
<p style="text-align: right;">Page 227</p> <p>1 BY MR. BISS: 2 Q Are you aware of that? Under a 3 certain president. I can't remember that 4 president's name. 5 A I'm aware that he was -- he was on 6 Trump's Security Council. 7 Q And you are aware that he was Obama's 8 director of national intelligence; correct? 9 A I can't say that for certain, but I'll 10 trust you. 11 Q Why would somebody of General Flynn's 12 stature want to get involved with a radical 13 domestic terrorist, dangerous, violent extremist 14 group like QAnon? 15 MS. BOLGER: Objection. Calls for 16 speculation. 17 Don't speculate. 18 BY MR. BISS: 19 Q Do you have any thoughts on that? 20 MS. BOLGER: No. You may not give 21 your thoughts. That calls for speculation. 22 Ask him questions -- I'm directing him not 23 to answer the question what was Michael 24 Flynn thinking, yes. 25 MR. BISS: Can you mark that place</p>	<p style="text-align: right;">Page 229</p> <p>1 reposted here this video of him taking a 2 QAnon oath, and not only that, but adding a 3 QAnon slogan to the tweet. You can see 4 there at least one reply, somebody 5 enthusiastically responding with the QAnon 6 slogan "Where we go one, we go all." 7 BY MR. BISS: 8 Q Because it has three exclamation 9 points? 10 A I believe so. 11 Q How about the one below that? 12 A That says, "Happy Independence Day." 13 Q Yeah. Isn't it true that Jack Flynn 14 was wishing everybody a happy Independence Day? 15 MS. BOLGER: Object to the form. 16 THE WITNESS: I think both things 17 can be true here. He says "Happy 18 Independence Day" and then he says a QAnon 19 slogan and he posts a video taking a QAnon 20 oath. 21 BY MR. BISS: 22 Q Isn't it true only Jack Flynn knows 23 why he wrote those words and the order he put 24 them in, the ties between them? Only he would 25 know; isn't that true?</p>

<p style="text-align: right;">Page 230</p> <p>1 A Yeah. Again, it would speak to what's 2 in his heart, but looking at the context here, 3 this is just ten days after the Q persona called 4 for people to take this precise oath with this 5 precise turn of phrase "Where we go one, we go 6 all." He's in this video with his family, doing 7 just that. And to top it off, he reposts it with 8 the QAnon slogan. 9 Q Let's go to the next page of the 10 document. 11 A These ones don't look to be dated. 12 Q They have reference to "happy 13 July 4th" on them? 14 MS. BOLGER: Doesn't mean they 15 were on July 4th. 16 MR. BISS: Okay. 17 BY MR. BISS: 18 Q Take a look at the first one. It's a 19 tweet by Jack Flynn. It says, "Two very great 20 and very special American women." As you point 21 out, it's enthusiastic because it has at least 22 two exclamation points. Plus it has two American 23 flags. And something else, a balloon or 24 something. I can't really tell. 25 A Might be a rose.</p>	<p style="text-align: right;">Page 232</p> <p>1 MS. BOLGER: For the record, 2 there's obviously a video there. What was 3 the video? 4 MR. BISS: Don't know. 5 THE WITNESS: I think I recognize 6 that video. 7 BY MR. BISS: 8 Q Then there's another statement down 9 here, quote -- 10 A Is that -- aren't these people taking 11 the oath? Would I be correct in saying that? 12 Q I don't know. I don't know if you 13 would be correct or not. It looks like "very 14 great and very special American women." That's 15 what it looks like to me. Don't know if it's a 16 video or not. 17 A It is a video. 18 Q Okay. The last thing that Sidney 19 Powell writes is, quote, "I solemnly swear to 20 support and defend the #Constitution." 21 Is that a QAnon slogan? 22 A No. But I do think it's important to 23 note what's in that video, if we can figure it 24 out, because it would be important to note if 25 they were taking an oath. If that oath included</p>
<p style="text-align: right;">Page 231</p> <p>1 Q Could be a rose. 2 Is the phrase "two very great and 3 special American women," is that a QAnon slogan? 4 A No. 5 Q Sidney Powell, is it your testimony 6 that Sidney Powell is a QAnon follower? 7 A No. 8 MS. BOLGER: Object to the form. 9 BY MR. BISS: 10 Q Sidney Powell writes in her tweet, 11 "Happy July 4th, 2020" with four American flags. 12 Is that something that a QAnon -- you would 13 expect from a QAnon follower? 14 MS. BOLGER: Object to the form. 15 Calls for speculation. 16 THE WITNESS: I mean, that's just 17 speculation. 18 BY MR. BISS: 19 Q "The best yet," two exclamation 20 points, is that a QAnon phrase? 21 A Not that I am aware. 22 Q And then we saw this one before, God 23 bless America," American flag emoji. Is that a 24 QAnon slogan? 25 A No.</p>	<p style="text-align: right;">Page 233</p> <p>1 the phrase "Where we go one, we go all." But we 2 don't know that because it's a printout. 3 Q Why -- after you leave the deposition 4 today, why don't you go back to your office and 5 get me that video and send it to me? Would you 6 do that for me? Would you mind doing that 7 research for me? 8 MS. BOLGER: You know that's not 9 his job. Keep going with your questions. 10 BY MR. BISS: 11 Q Is that a QAnon slogan, I solemnly 12 swear to support and defend the #Constitution"? 13 A Depends what context it was shared in. 14 Q And then things don't become a QAnon 15 slogan just because you put a hashtag in front of 16 it, like #bread? 17 A No. 18 Q One of the terms that CNN had me 19 search all the phones and everything for, #bread; 20 can you believe it? 21 The next tweet, Jack Flynn retweets 22 Barbara Flynn, who writes hashtag Happy 4th of 23 July, American flag, star star star, American 24 flag. 25 Is that a QAnon slogan?</p>

<p style="text-align: right;">Page 234</p> <p>1 MS. BOLGER: Same question, 2 Mr. Biss, as the video. 3 BY MR. BISS: 4 Q Is that a QAnon slogan? 5 A I just don't have the full context of 6 this tweet. Obviously, on its own, hashtag happy 7 4th of July is not a QAnon slogan, but this tweet 8 has been presented to me in the context of it 9 including a 12-second video that I have no idea 10 what that is. 11 Q That makes two of us. Let's go to the 12 next page. 13 MS. BOLGER: Steve, soon I need to 14 run to the bathroom, so I don't know if you 15 want to do it at this time, now, or when 16 you're done with this exhibit. 17 MR. BISS: Let me get through this 18 exhibit -- let's break now. Let's just 19 break now. 20 (Whereupon there was a brief 21 recess from 4:23 p.m. until 4:33 p.m.) 22 BY MR. BISS: 23 Q Mr. O'Sullivan, we're back on the 24 record after a short break. We're still talking 25 about the Jack Flynn tweets and retweets. We're</p>	<p style="text-align: right;">Page 236</p> <p>1 A I think it's ignoring the critical 2 context, which everybody -- which all the 3 reporting on this was focusing on, which was that 4 language makes this unique and ties it directly 5 to QAnon, which is "Where we go one, we go all." 6 Q Because you wanted it to be a QAnon 7 slogan? You had a preconceived idea about this 8 video? 9 A No. 10 Q You wanted it to be a QAnon slogan and 11 that's what you reported. You disregarded Sidney 12 Powell's text message. You disregarded the 13 statute. You didn't even bother to check the 14 link. Isn't that true? 15 MS. BOLGER: I'm going to object 16 to the form. You're getting dangerously 17 close to badgering him. Don't go any 18 further. 19 You can answer. 20 THE WITNESS: Yeah, I mean CNN 21 included in its July story the response from 22 Sidney Powell, which also is false. 23 BY MR. BISS: 24 Q Let's go to the top retweet, and 25 Sidney Powell writes in her tweet, "For those</p>
<p style="text-align: right;">Page 235</p> <p>1 on a page with two retweets -- of to Sidney 2 Powell tweets on July 4, 2020. I want to talk 3 about the bottom one first and then the top one. 4 Jack Flynn retweeted Sidney Powell and 5 she says in her tweet, "12 those apparently 6 traumatized or struggling to comprehend @JenFlynn 7 video above, including all the #left and 8 regressive media. The #oath comes from Federal 9 Statute 5 USC 1331." 10 Do you see that? 11 A Yes. 12 Q Did you see that Sidney Powell tweet 13 on July 4, 2020? Did you see it? 14 MS. BOLGER: Objection. It's not 15 clear that was on July 4, 2020. 16 But you can answer. 17 THE WITNESS: I can't recall. But 18 I would point out it's not a great response. 19 I mean, we don't have access to what is in 20 this link right here, but I haven't seen a 21 federal statute oath that includes the 22 phrase "Where we go one, we go all." So, 23 again, it's not a great response. 24 BY MR. BISS: 25 Q In your view.</p>	<p style="text-align: right;">Page 237</p> <p>1 determined to superimpose a conspiracy or 2 anything nefarious into #take the oath and #take 3 the pledge, the #Constitution or all that is good 4 in and about #America and its history which we 5 must preserve, read Frankl." 6 Did you read that tweet on July 4, 7 2020? 8 A I don't recall. 9 Q Did you ever make any effort to 10 contact Sidney Powell to ask her what her tweets 11 were all about? 12 A I don't recall. I think I contacted 13 Sidney Powell at some point on other stories. 14 Q How about on this story? 15 A I don't recall. 16 MS. BOLGER: Object to the form. 17 Which story, the 4th of July story or the 18 one that's at issue hear. 19 MR. BISS: Both, thank you. 20 BY MR. BISS: 21 Q Did you make any effort to contact 22 her -- 23 A I didn't write the July 2020 CNN 24 story, but as we can see, it includes a response 25 from Sidney Powell. No, I did not reach out to</p>

<p style="text-align: right;">Page 238</p> <p>1 Sidney Powell for the February 2021 story. Her 2 response had already been included in the July 3 story. It included a false statement. 4 Q You didn't reach out to Sidney Powell 5 in July of 2020 or February of 2021; correct? 6 MS. BOLGER: Objection to form. 7 THE WITNESS: I didn't write the 8 story in July 2020. 9 BY MR. BISS: 10 Q The question is, you didn't reach out 11 to Sidney Powell in July of 2020 to ask her what 12 her comments -- her tweets were all about? You 13 didn't reach out to her at all? 14 MS. BOLGER: Object to the form. 15 THE WITNESS: There had been no 16 reason for me to reach out to her in 17 July 2020. 18 BY MR. BISS: 19 Q So the answer is no, you didn't reach 20 out to her because there was no need for you to 21 reach out to her. That's what you're saying; 22 right? 23 MS. BOLGER: In July 2020, that's 24 what he said, yes. 25</p>	<p style="text-align: right;">Page 240</p> <p>1 Does that sound like It's coming from 2 a QAnon follower? 3 MS. BOLGER: Object to the form. 4 THE WITNESS: This tweet doesn't 5 reference QAnon. 6 BY MR. BISS: 7 Q Do you know why Jack Flynn retweeted 8 this tweet? 9 MS. BOLGER: Object to the form. 10 THE WITNESS: Which one? 11 BY MR. BISS: 12 Q The one we're talking about from 13 BoumtjeBoumtje. 14 A No. 15 Q The tweet below, Jack Flynn retweets a 16 tweet by Machiavelli. Do you know why he 17 retweeted that tweet? 18 A No. 19 Q It says -- 20 MS. BOLGER: If it saves time, we 21 will stipulate Mr. O'Sullivan has no idea 22 what Jack Flynn was thinking. 23 BY MR. BISS: 24 Q Machiavelli tweets, "Happy 25 Independence Day."</p>
<p style="text-align: right;">Page 239</p> <p>1 BY MR. BISS: 2 Q Do you agree with what your counsel 3 just said? 4 A In July 2020, I wasn't the author of 5 that story, so there was no need for me to reach 6 out in July 2020. 7 Q And you didn't reach out to her in 8 July 2020? 9 A Correct. 10 Q Okay. Let's go to the next page of 11 the exhibit. It's a retweet by Jack Flynn of an 12 account called BoumtjeBoumtje is the best way I 13 can pronounce that. You may pronounce it 14 differently. 15 Do you know why Jack Flynn retweeted 16 that on July 4, 2020? 17 A No. 18 MS. BOLGER: Objection to form. 19 BY MR. BISS: 20 Q You see it's an American flag. Is 21 that a QAnon symbol? 22 A No. 23 Q It says, "Happy 244th birthday to the 24 greatest nation on earth and the hope of all 25 mankind," with an American flag emoji.</p>	<p style="text-align: right;">Page 241</p> <p>1 Is that a QAnon phrase? 2 A No. 3 Q And general Michael Flynn, is that in 4 any way related or did that in any way inform you 5 that this was related to QAnon? 6 A Doesn't seem so. 7 Q Next page. Jack Flynn retweets Big 8 Moose, and Big Moose writes, "It is time to 9 retake the oath I first took in 1976 to defend 10 the Constitution of my United States of America 11 on today, Independence Day 2020. Take the oath. 12 #WWG1WGA #General Flynn." 13 Do you know why Jack Flynn retweeted 14 the Big Moose? 15 MS. BOLGER: Object to the form. 16 THE WITNESS: It's a great 17 username. 18 Again, I can't speak to why he is 19 retweeting what he's retweeting. This tweet 20 is pretty explicitly related to QAnon. It 21 includes the "Where we go one, we go all" 22 slogan. It's also including the hashtag 23 "take the oath," which in this context is 24 the phrase that was also used in the Q drop, 25 which I think was around the 24th of</p>

<p style="text-align: right;">Page 242</p> <p>1 June 2020, telling people to take the oath. 2 You'll also see that that #Take 3 the Oath was posted in General Michael 4 Flynn's tweet when he and his family took 5 this oath to -- this oath that included the 6 QAnon slogan. So the context as to why this 7 person, Big Moose, as the username reads, is 8 talking about the oath is clearly in the 9 context of QAnon. 10 BY MR. BISS: 11 Q All right. Take a look at the next 12 one, Texas Proud. Do you know why Jack Flynn 13 retweeted Texas Proud? 14 A No. 15 Q What is hashtag MAGA, what's hashtag 16 MAGA? 17 A I believe that's Make America Great 18 Again. 19 Q Is that a QAnon slogan? 20 A No. It's most associated with Trump. 21 Q What does it stand for? 22 A Make America great again. But also in 23 this tweet there is a QAnon slogan, "Where we go 24 one, we go all." 25 Q Do you know why Jack Flynn retweeted</p>	<p style="text-align: right;">Page 244</p> <p>1 videos that I haven't been able to watch, 2 what's in them is important in the earlier 3 tweets you showed me. So there is a trend 4 happening at the time. It appears that the 5 Flynn's played into that trend, which was 6 QAnon. 7 BY MR. BISS: 8 Q How do you know that? You told me you 9 didn't know why Jack Flynn retweeted any of 10 these. How did you know what he was doing? 11 A You asked me why Texas Proud would 12 have tweeted -- 13 Q I asked you if you knew. 14 A I said I can't speak specifically, but 15 I'm just giving you the context of they're 16 talking about the oath and the QAnon slogan and 17 the context of when the tweet is, it is 18 important. 19 Q Did it ever cross your mind even once 20 that these people might have been tweeting 21 support for General Flynn? 22 MS. BOLGER: Object to the form. 23 BY MR. BISS: 24 Q Did that ever cross your mind? 25 MS. BOLGER: Calls for</p>
<p style="text-align: right;">Page 243</p> <p>1 this? 2 MS. BOLGER: Objection to form. 3 THE WITNESS: No. 4 BY MR. BISS: 5 Q Do you know why Texas Proud used the 6 hashtag MAGA? 7 MS. BOLGER: Object to the form. 8 THE WITNESS: No. 9 BY MR. BISS: 10 Q Do you know why Texas Proud used the 11 hashtag WWG1WGA? 12 A No. 13 Q Do you know why Texas Proud wrote, 14 "Taking the oath standing with General Flynn," 15 and it goes on. Do you know why they wrote those 16 words? 17 MS. BOLGER: Objection to form. 18 THE WITNESS: No. But again, in 19 the context of taking the oath, plus sharing 20 the QAnon "Where we go one, we go all" 21 slogan in this context, it came -- at a time 22 also, by the way, where after the Q post 23 calling for people to take oaths, take the 24 oath, people were doing it as a trend, which 25 is actually why it's important that these</p>	<p style="text-align: right;">Page 245</p> <p>1 speculation. 2 BY MR. BISS: 3 Q Or are you just so fixated on the 4 QAnon slogan that it's like a Pavlovian response 5 from you, must be QAnon? 6 MS. BOLGER: Hey, Steven, watch 7 it. Watch it. 8 BY MR. BISS: 9 Q Is that -- 10 MS. BOLGER: You can answer, 11 Donie. 12 THE WITNESS: All I can say is 13 that these tweets you're showing me here 14 have the QAnon slogan. 15 BY MR. BISS: 16 Q No matter what the intent of the 17 author, if there's what you believe to be a QAnon 18 slogan in the body of the tweet or retweet 19 somewhere, then it's evidence of a QAnon 20 follower? 21 MS. BOLGER: Object to the form. 22 BY MR. BISS: 23 Q No matter what? 24 A No. The context is important. 25 Q Let's go to the last one. Last page</p>

<p style="text-align: right;">Page 246</p> <p>1 of the exhibit is a retweet of some account 2 called Natga Natalia, and that particular 3 account, in the body of their tweet, features a 4 picture of the cover of White Squall and the 5 bell, "Where we go one, we go all". Is it your 6 intention that just by putting that bell up there 7 and the words "Where we go one, we go all," 8 that's a QAnon slogan? 9 MS. BOLGER: Object to the form 10 witness. 11 BY MR. BISS: 12 Q They didn't write WWG1WGA, but they 13 used the phrase on a bell. Is that your 14 testimony, that by publishing a picture of the 15 bell, that that's a QAnon -- evidence of being a 16 QAnon follower? 17 MS. BOLGER: Object to the form. 18 Let him testify. 19 Go ahead. 20 THE WITNESS: I can't speak to why 21 this user, Natga Natalia, posted what they 22 posted. If you want, I can tell you a 23 little bit of context about this picture and 24 whatnot from my reporting. But I can't 25 speak specifically to why this person posted</p>	<p style="text-align: right;">Page 248</p> <p>1 on QAnon, some QAnon followers falsely 2 believe that the slogan was on a bell on 3 JFK's boat. Of which that is false. 4 There's no record for it. It could be from 5 the Kennedy Presidential Library that we 6 contacted. It was also something that was 7 misinformation that was repeated by Sidney 8 Powell. So in this -- the context of this 9 tweet, that there's a mention of JFK, I 10 mean, how does JFK make sense in the context 11 of sharing a picture of White Squall? 12 BY MR. BISS: 13 Q How would you know? 14 MS. BOLGER: Object to the form. 15 THE WITNESS: I'm trying to give 16 you some context into the background of this 17 picture and the bell and JFK and the 18 misinformation that surrounds it. 19 BY MR. BISS: 20 Q So no matter what this Natga Natalia 21 wrote, at the end of the day you're going to 22 conclude it's somehow connected to QAnon, no 23 matter what the explanation is? 24 MS. BOLGER: Objection to form. 25 That misstates his testimony.</p>
<p style="text-align: right;">Page 247</p> <p>1 this. 2 BY MR. BISS: 3 Q What's the difference between just 4 using the letters WWG1WGA and showing a picture 5 of a bell with the words on it? What's the 6 difference? 7 MS. BOLGER: Object to the form. 8 THE WITNESS: Would you like me to 9 speak about the context of this tweet? 10 Q No, I would like you to answer my 11 question. 12 A I don't think I can answer that 13 question. 14 Q The tweet says, quote, "And @JenFlynn 15 is also Capitol," all caps, "obviously," lower 16 caps, "a fan of the movie White Squall and JFK." 17 What's the problem with this tweet? 18 MS. BOLGER: Object to the form. 19 You can answer that question, 20 Donie. I have no idea what it meant. 21 MR. BISS: You're not being 22 deposed. 23 MS. BOLGER: I know, but I should 24 understand the questions you're asking. 25 THE WITNESS: So from my reporting</p>	<p style="text-align: right;">Page 249</p> <p>1 THE WITNESS: I haven't said that. 2 BY MR. BISS: 3 Q In fact, you don't know what this 4 person meant by their tweet? You don't know; 5 correct? 6 A I don't know what was in their mind, 7 but -- 8 Q You don't why -- 9 MS. BOLGER: He's not done. 10 MR. BISS: Yes, he was. 11 MS. BOLGER: He said "but" and you 12 cut him off. 13 THE WITNESS: But I think the 14 context which I'm trying to share is 15 important. 16 BY MR. BISS: 17 Q And you don't know why Jack Flynn 18 retweeted it? 19 A No. 20 (Exhibit 31 was marked.) 21 Q Mr. O'Sullivan, I hand you a document 22 marked as Exhibit 31. We've been over a couple 23 of these. These are Sidney Powell's tweets on 24 July 4 -- July 6. 25 MS. BOLGER: For the record,</p>

<p style="text-align: right;">Page 250</p> <p>1 Steven, in the other exhibit you said</p> <p>2 they're from July 4th. I don't think you're</p> <p>3 right about that. I think they're later.</p> <p>4 The record will speak for itself.</p> <p>5 BY MR. BISS:</p> <p>6 Q Take a look at these documents and</p> <p>7 tell me if you've ever seen any of them before</p> <p>8 today.</p> <p>9 A I think I've seen some of them.</p> <p>10 Q Which ones have you seen? Which pages</p> <p>11 of the exhibit?</p> <p>12 A I think I've seen this page with the</p> <p>13 picture of the bell.</p> <p>14 Q That's the third page of the exhibit?</p> <p>15 A Correct. That one I can say for sure.</p> <p>16 Again, I would point out the tweet on</p> <p>17 the second page includes the hashtag "take the</p> <p>18 oath," which is precisely what was posted by the</p> <p>19 Q account.</p> <p>20 Q You're saying that no one else can use</p> <p>21 that oath? Nobody else can use it? It's only</p> <p>22 QAnon? Once it appears in a Q drop no one else</p> <p>23 can use it because it's QAnon?</p> <p>24 A I'm not saying that at all.</p> <p>25 MS. BOLGER: Objection to form.</p>	<p style="text-align: right;">Page 252</p> <p>1 Q Hashtag patriots; QAnon slogan?</p> <p>2 A No, although there's some context, of</p> <p>3 course, for QAnon followers to call each other</p> <p>4 patriots.</p> <p>5 Q Hashtag rule of law; QAnon slogan?</p> <p>6 A I don't think so.</p> <p>7 Q Hashtag Constitution?</p> <p>8 A I don't think so.</p> <p>9 Q Look at the very last page. Sidney</p> <p>10 Powell tweets out. This tweet has a date July 6,</p> <p>11 2020 on it, quote, "For those determined to</p> <p>12 superimpose a conspiracy or anything nefarious</p> <p>13 into #take the oath, #take the pledge, the</p> <p>14 #Constitution or all that is good in and about</p> <p>15 #America and its history, which we must preserve,</p> <p>16 read Frankl."</p> <p>17 Do you know what she was referring to</p> <p>18 when she said "read Frankl"?</p> <p>19 MS. BOLGER: Object to the form.</p> <p>20 I think it's cut off.</p> <p>21 MR. BISS: No, it's not.</p> <p>22 THE WITNESS: I don't know what is</p> <p>23 in this link.</p> <p>24 BY MR. BISS:</p> <p>25 Q Have you ever read Victor Frankl?</p>
<p style="text-align: right;">Page 251</p> <p>1 BY MR. BISS:</p> <p>2 Q So what are you saying?</p> <p>3 A I'm saying in the context that we're</p> <p>4 viewing this, Sidney Powell in her tweet on the</p> <p>5 first page of this exhibit has left out the point</p> <p>6 that this oath also includes the QAnon slogan.</p> <p>7 She has a false explanation about John Kennedy's</p> <p>8 bell. She used the hashtag "take the oath,"</p> <p>9 which is precisely what was used in the Q post.</p> <p>10 It's all important context.</p> <p>11 Q You're leaving out all the context of</p> <p>12 July 4, God bless America. You're leaving out</p> <p>13 all that?</p> <p>14 MS. BOLGER: Object to the form.</p> <p>15 Those aren't in these exhibits that I see.</p> <p>16 BY MR. BISS:</p> <p>17 Q Correct?</p> <p>18 MS. BOLGER: He's talking about</p> <p>19 the exhibit.</p> <p>20 THE WITNESS: We're talking about</p> <p>21 the QAnon slogan.</p> <p>22 BY MR. BISS:</p> <p>23 Q How about #pledge of allegiance, is</p> <p>24 that a QAnon slogan?</p> <p>25 A I don't think so.</p>	<p style="text-align: right;">Page 253</p> <p>1 A I don't believe so.</p> <p>2 Q Do you know what she's referring to by</p> <p>3 "read Frankl"?</p> <p>4 A I can't speak to what she was talking</p> <p>5 about here. I will note it's notable in all her</p> <p>6 tweets that you show here in this exhibit, it</p> <p>7 doesn't choose to explain why the Flynn's said</p> <p>8 "Where we go one, we go all" in the oath they</p> <p>9 took.</p> <p>10 Q You don't think that? There's nothing</p> <p>11 that she could have written here that would</p> <p>12 convince you that it's not a QAnon oath? Nothing</p> <p>13 that she could have written? You just</p> <p>14 fundamentally believe that this is a QAnon oath;</p> <p>15 is that correct?</p> <p>16 MS. BOLGER: Object to the form.</p> <p>17 THE WITNESS: The oath that was</p> <p>18 posted on July 4th?</p> <p>19 BY MR. BISS:</p> <p>20 Q Yeah. The video. There's nothing</p> <p>21 that would be able to convince you that doesn't</p> <p>22 have to do with conspiracy theory, nothing</p> <p>23 nefarious about it? That's what she's saying</p> <p>24 repeatedly here.</p> <p>25 MS. BOLGER: Compound question.</p>

<p style="text-align: right;">Page 254</p> <p>1 If you're going to ask a question, ask a</p> <p>2 question, but don't keep asking it.</p> <p>3 BY MR. BISS:</p> <p>4 Q Do you see where she keeps telling you</p> <p>5 over and over in this series of tweets? It's not</p> <p>6 just one. It's multiple.</p> <p>7 MS. BOLGER: Telling you what? I</p> <p>8 don't understand the question.</p> <p>9 BY MR. BISS:</p> <p>10 Q If you don't understand my question,</p> <p>11 Mr. O'Sullivan please, tell me.</p> <p>12 MS. BOLGER: I'll just object on</p> <p>13 the grounds that things are unclear.</p> <p>14 MR. BISS: Okay.</p> <p>15 BY MR. BISS:</p> <p>16 Q You don't understand from reading all</p> <p>17 these tweets together that she's explaining to</p> <p>18 you that this doesn't have anything to do with</p> <p>19 QAnon? You don't get that?</p> <p>20 A She fails to address the key issue,</p> <p>21 though, doesn't she? The QAnon slogan.</p> <p>22 Q She doesn't fail to address it at all.</p> <p>23 She says where the oath came from. She says it</p> <p>24 over and over. You just don't see that, is what</p> <p>25 you're telling me.</p>	<p style="text-align: right;">Page 256</p> <p>1 THE WITNESS: I think we ought to</p> <p>2 read the full context and read the other</p> <p>3 tweets.</p> <p>4 BY MR. BISS:</p> <p>5 Q Read the other tweets. Tell me what</p> <p>6 the answer to my question is.</p> <p>7 MS. BOLGER: What's the pending</p> <p>8 question?</p> <p>9 BY MR. BISS:</p> <p>10 Q Is it your testimony that these tweets</p> <p>11 dated August 13, 2020 are examples of -- in your</p> <p>12 view, examples of Jack Flynn being adherent to</p> <p>13 the QAnon system?</p> <p>14 MS. BOLGER: Object to form.</p> <p>15 BY MR. BISS:</p> <p>16 Q Is this evidence, in your view, that</p> <p>17 Jack Flynn is an adherent to the QAnon belief</p> <p>18 system?</p> <p>19 MS. BOLGER: Object to form.</p> <p>20 THE WITNESS: You know, I think</p> <p>21 looking at this tweet in the context, the</p> <p>22 broader context, this question, I can't</p> <p>23 speak for what's in his mind, but obviously</p> <p>24 this tweet came four or five weeks after</p> <p>25 Jack Flynn had appeared in a video taking a</p>
<p style="text-align: right;">Page 255</p> <p>1 MS. BOLGER: Object to the form.</p> <p>2 THE WITNESS: Again, she doesn't</p> <p>3 explain "Where we go one, we go all" came</p> <p>4 from.</p> <p>5 BY MR. BISS:</p> <p>6 Q What is hashtag America first; what</p> <p>7 does that mean?</p> <p>8 A I can't say for sure.</p> <p>9 Q Do you know it to be a QAnon slogan?</p> <p>10 A No.</p> <p>11 (Exhibit 32 was marked.)</p> <p>12 Q Mr. O'Sullivan, I hand you a copy of a</p> <p>13 document we've marked as Exhibit 32. This is a</p> <p>14 series of tweets by Jack Flynn that appear to be</p> <p>15 dated August 13, 2020. Have you ever seen these</p> <p>16 tweets before?</p> <p>17 A Yes.</p> <p>18 Q He asks a question, "What's wrong with</p> <p>19 the statement Where we go one, we go all"? You</p> <p>20 see that?</p> <p>21 A Yes.</p> <p>22 Q Is it your testimony that this is an</p> <p>23 example of Jack Flynn somehow advocating or being</p> <p>24 a QAnon follower?</p> <p>25 MS. BOLGER: Object to the form.</p>	<p style="text-align: right;">Page 257</p> <p>1 pledge that included -- an oath that</p> <p>2 included "Where we go one, we go all"</p> <p>3 slogan. I don't see anything in this tweet</p> <p>4 thread that explains why Jack Flynn would</p> <p>5 have an issue with that slogan.</p> <p>6 I think it's notable that he asks,</p> <p>7 "Anyone have a photo of Kennedy's brass deck</p> <p>8 bell that shows this statement?" We know</p> <p>9 that that doesn't exist and we know that</p> <p>10 that is something that QAnon followers, some</p> <p>11 of them, believe does exist, that there was</p> <p>12 a bell on JFK's boat that had the statement</p> <p>13 "Where we go one, we go all," but it doesn't</p> <p>14 exist.</p> <p>15 BY MR. BISS:</p> <p>16 Q So what's the point?</p> <p>17 MS. BOLGER: Object to the form.</p> <p>18 BY MR. BISS:</p> <p>19 Q What's your point?</p> <p>20 MS. BOLGER: Objection to form.</p> <p>21 THE WITNESS: Just the repetition</p> <p>22 of what some QAnon believers believe.</p> <p>23 BY MR. BISS:</p> <p>24 Q So him asking a question for somebody</p> <p>25 to post a picture of the bell, your testimony is</p>

<p style="text-align: right;">Page 258</p> <p>1 that makes him a QAnon follower?</p> <p>2 MS. BOLGER: Object to form. That</p> <p>3 misstates his --</p> <p>4 THE WITNESS: I didn't call him a</p> <p>5 QAnon follower.</p> <p>6 BY MR. BISS:</p> <p>7 Q That somehow asking that question,</p> <p>8 asking for somebody to post a picture of the</p> <p>9 bell, is it your testimony that somehow that</p> <p>10 evidences an adherence to the QAnon belief</p> <p>11 system?</p> <p>12 MS. BOLGER: Objection to form.</p> <p>13 Misstates testimony.</p> <p>14 You can answer.</p> <p>15 THE WITNESS: That's not what I</p> <p>16 said. What I did say is this tweet, "Anyone</p> <p>17 have the photo of Kennedy's brass deck bell</p> <p>18 that shows this statement" -- "this</p> <p>19 statement" being "Where we go one, we go</p> <p>20 all" -- the fact that the supposed existence</p> <p>21 of this bell on Kennedy's boat is something</p> <p>22 that was being shared in QAnon circles, you</p> <p>23 know, QAnon believers believe that is the</p> <p>24 genesis of this "Where we go one, we go all"</p> <p>25 slogan. So if anything, I did not call Jack</p>	<p style="text-align: right;">Page 260</p> <p>1 as Exhibit 33. This is a tweet from Jack Flynn</p> <p>2 dated August 20, 2020.</p> <p>3 You told me earlier that one of the</p> <p>4 tenets of the QAnon belief system is the plan,</p> <p>5 trust the plan?</p> <p>6 MS. BOLGER: Object to the form.</p> <p>7 He did not. You're misstating his</p> <p>8 testimony.</p> <p>9 BY MR. BISS:</p> <p>10 Q Do you remember that? Judge Woods</p> <p>11 even made mention of that in his order that</p> <p>12 you're bound by.</p> <p>13 MS. BOLGER: Object to the form.</p> <p>14 Calls for a legal conclusion.</p> <p>15 THE WITNESS: What is the</p> <p>16 question?</p> <p>17 BY MR. BISS:</p> <p>18 Q The question is on this document, did</p> <p>19 you read a copy of this at the time it was</p> <p>20 published?</p> <p>21 A I can't say for sure.</p> <p>22 Q Is this -- in your view, is this</p> <p>23 evidence of Jack Flynn adhering to the belief</p> <p>24 system of QAnon?</p> <p>25 MS. BOLGER: Object to the form.</p>
<p style="text-align: right;">Page 259</p> <p>1 Flynn a QAnon follower, but this tweet could</p> <p>2 be an indication that it is somebody who has</p> <p>3 been steeped in or aware of the</p> <p>4 misinformation that is spreading in QAnon</p> <p>5 circles.</p> <p>6 BY MR. BISS:</p> <p>7 Q It could be somebody just asking a</p> <p>8 question?</p> <p>9 MS. BOLGER: Object to form.</p> <p>10 BY MR. BISS:</p> <p>11 Q Isn't that true?</p> <p>12 A The premise of the question is based</p> <p>13 on the existence of a bell on Kennedy's boat.</p> <p>14 Q Or nonexistence of a bell; correct?</p> <p>15 MS. BOLGER: Object to the form.</p> <p>16 Let him finish.</p> <p>17 THE WITNESS: That's not what the</p> <p>18 question asks. "Anyone have a photo of</p> <p>19 Kennedy's brass deck bell that shows the</p> <p>20 statement?" It's not necessarily saying</p> <p>21 does that bell exist or not.</p> <p>22 BY MR. BISS:</p> <p>23 Q All right.</p> <p>24 (Exhibit 33 was marked.)</p> <p>25 I'll show you a document I've marked</p>	<p style="text-align: right;">Page 261</p> <p>1 THE WITNESS: I can't speak to</p> <p>2 what's going on in his mind, but again, it</p> <p>3 ends with, "If Q does, too, no harm no</p> <p>4 foul," which I think some QAnon followers</p> <p>5 could read as, okay, we're on to something</p> <p>6 here, it's good.</p> <p>7 Keep in mind that Jack Flynn would</p> <p>8 go on a few months later to reshare a QAnon</p> <p>9 post on his Twitter account.</p> <p>10 BY MR. BISS:</p> <p>11 Q When did you see that post?</p> <p>12 A Through this legal process.</p> <p>13 Q The prep for this deposition?</p> <p>14 A Yes.</p> <p>15 MR. BISS: Has that been produced</p> <p>16 in discovery?</p> <p>17 MS. BOLGER: It's a tweet.</p> <p>18 MR. BISS: It has been produced by</p> <p>19 CNN in discovery.</p> <p>20 MS. BOLGER: I'll tell you what I</p> <p>21 told you before and what Judge -- Magistrate</p> <p>22 Cave agreed with me that my work product</p> <p>23 does not have to be produced to you.</p> <p>24 BY MR. BISS:</p> <p>25 Q Jack Flynn writes, "I advocate for the</p>

<p style="text-align: right;">Page 262</p> <p>1 Constitution and Bill of Rights. If Q does, too, 2 no harm no foul." 3 Is that evidence that Jack Flynn is an 4 adherent to the QAnon belief system or is it 5 evidence that Jack Flynn is an advocate for the 6 Constitution and Bill of Rights? 7 MS. BOLGER: Object to form. 8 THE WITNESS: This is the precise 9 kind of language that followers of QAnon are 10 looking for and try it on, "I advocate for 11 the Constitution and Bill of Rights. If Q 12 does, too, no harm no foul." 13 You know, at this point, 14 August 2020, there's a fairly general 15 understanding covered in quite a lot of 16 media. Some of the more crazy stuff that is 17 part of the QAnon conspiracy theory that 18 some of the followers adhere to. So kind of 19 by posting something along the lines of, 20 well, if Q does this one thing that's fine, 21 I think that would just be seen by a lot of 22 QAnon followers, again, as a signal of 23 support. 24 BY MR. BISS: 25 Q Do you know what Jack Flynn intended</p>	<p style="text-align: right;">Page 264</p> <p>1 BY MR. BISS: 2 Q This tweet. 3 A I don't have that specific evidence at 4 hand. 5 Q Do you know of any evidence in which 6 Jack Flynn or any Flynn family member stated that 7 they trust the plan or that they believe in the 8 plan? 9 MS. BOLGER: Object to the form. 10 THE WITNESS: I don't recall. 11 (Exhibit 34 was marked.) 12 BY MR. BISS: 13 Q Mr. O'Sullivan, I hand you a copy of a 14 document. It's a tweet from Jack Flynn dated 15 August 21. Have you ever seen this document 16 before today? 17 A Yes. 18 Q This is one that was again referred to 19 by Judge Woods in his opinion. This is a tweet 20 where Jack Flynn includes the tweet of some 21 account called Escape The Matrix. The Escape The 22 Matrix tweet says, "We are with you, Jack" 23 exclamation point, American flag. And then it 24 has a copy a meme or some type of iconography, 25 the American flag, the letter Q, and the words</p>
<p style="text-align: right;">Page 263</p> <p>1 when he tweeted this message on August 20, 2020? 2 A No, but I'm just telling you how it 3 may have been received, and then of course in the 4 broader context. 5 Q Can you identify anyone who received 6 it the way you just described? Can you identify 7 anybody? 8 A Not with this specific tweet, but... 9 MS. BOLGER: Wait. He said "but." 10 Are you done with your answer? 11 THE WITNESS: Not with this 12 specific tweet. But it is certainly the 13 kind of -- it would go along with taking the 14 QAnon pledge in July and posting it publicly 15 on Twitter. 16 BY MR. BISS: 17 Q Jack Flynn states unequivocally, "I 18 advocate for the Constitution and the Bill of 19 Rights." You know where Jack Flynn stands. Can 20 you identify a single person that interpreted 21 this as being a QAnon -- to support QAnon or any 22 of the QAnon belief systems? 23 MS. BOLGER: That sentence? 24 THE WITNESS: That sentence? 25</p>	<p style="text-align: right;">Page 265</p> <p>1 "Where we go one, we go all." 2 Do you see that? 3 A Yes. 4 Q Jack Flynn writes, "If this means you 5 believe in the Constitution and equal justice 6 under the law, then this works for me." American 7 flag. 8 Do you see that? 9 A Yes. 10 Q Is it your testimony that this 11 document evidences an adherence by Jack Flynn to 12 the QAnon belief system? 13 A Can you remind me what date this was 14 posted? 15 Q It says August 21 on Escape The 16 Matrix. 17 A That is when the Escape The Matrix 18 tweet was posted, but do we know when Jack's 19 tweet was posted? 20 Q I don't have a date on that. 21 A Just to be clear, those time stamps 22 could be different. The August 21 refers to the 23 Escape The Matrix tweet. The Go Jack Flynn 24 tweets, we don't have a date for here. 25 Q So what's the answer to my question?</p>

<p style="text-align: right;">Page 266</p> <p>1 MS. BOLGER: What was the 2 question? 3 BY MR. BISS: 4 Q The question is, is it your testimony, 5 Mr. O'Sullivan, that this tweet evidences 6 adherence by Jack Flynn to the QAnon belief 7 system? 8 A I think, again, it's a signal of 9 support. 10 Q All right. Do you have any evidence 11 for that? 12 MS. BOLGER: He's not done. Let 13 him finish. 14 THE WITNESS: Its got that big Q, 15 says, "Where we go one, we go all," and Jack 16 Flynn's tweet, although we don't know what 17 date it was posted, seems to be endorsing 18 it, saying, well, if this is a positive 19 thing, go for it. 20 BY MR. BISS: 21 Q No, it doesn't. It doesn't say that 22 at all. 23 MS. BOLGER: Don't interrupt him. 24 BY MR. BISS: 25 Q It doesn't say that at all.</p>	<p style="text-align: right;">Page 268</p> <p>1 form. 2 Don't answer it asked that way. 3 Don't badger the witness. 4 MR. BISS: Are you instructing him 5 not to answer the question? 6 MS. BOLGER: That question, when 7 you say "even you," yes. You can ask a 8 different question. 9 MR. BISS: Can you flag that as 10 well. 11 BY MR. BISS: 12 Q Even you would come to the conclusion, 13 reading the tweet, that Jack Flynn believes in 14 the Constitution and equal justice? 15 MS. BOLGER: He's not going to 16 answer a question that begins "even you." 17 BY MR. BISS: 18 Q When you read Jack Flynn's tweet, do 19 you have any doubt that Jack Flynn believes in 20 the Constitution and equal justice under the law 21 when you read this tweet? 22 A He's writing -- he seems to be 23 signaling support for belief in the Constitution 24 and equal justice under the law, but also 25 qualifies it by saying, you know, if that's what</p>
<p style="text-align: right;">Page 267</p> <p>1 MS. BOLGER: Don't interrupt him. 2 THE WITNESS: I would be 3 interested -- I think it would be 4 important -- it's a shame we don't have the 5 date on this. If this came on the same 6 day -- that's why context is important -- 7 same day where, you know, he was also 8 retweeting a ton of "Where we go one, we go 9 all" slogans, so that would have been 10 important context to know. 11 BY MR. BISS: 12 Q Just making it up? 13 MS. BOLGER: Objection to form. 14 BY MR. BISS: 15 Q Do you have any evidence that this 16 tweet evidences an adherence to the QAnon belief 17 system? 18 A We do not allege that Jack Flynn was a 19 QAnon follower. 20 Q Mr. O'Sullivan, when you read the 21 tweet by Jack Flynn, even you have to get the 22 sense that Jack Flynn believes in the 23 Constitution and equal justice. Even you would 24 come to that conclusion; right? 25 MS. BOLGER: Objection to the</p>	<p style="text-align: right;">Page 269</p> <p>1 it means to be a QAnon follower, works for me. 2 Q It doesn't say that anywhere. 3 A There's that big Q and where it says, 4 "Where we go one, we go all," the QAnon slogan. 5 Q There's no reference to QAnon? 6 MS. BOLGER: Objection to form. 7 BY MR. BISS: 8 Q He's referring to the account, Escape 9 The Matrix. "If this means that you believe in 10 the Constitution, then this works for me." 11 A So you're just -- 12 MS. BOLGER: Objection to form. 13 THE WITNESS: You're ignoring the 14 big Q. 15 BY MR. BISS: 16 Q He doesn't say, "I subscribe to it." 17 You have to acknowledge that. He doesn't say it 18 at all? 19 MS. BOLGER: Object to the form. 20 You're badgering the witness. 21 You can answer it one last time, 22 Donie. 23 BY MR. BISS: 24 Q Where in Jack Flynn's tweet does it 25 say that "I subscribe to QAnon" or "I support</p>

<p style="text-align: right;">Page 270</p> <p>1 QAnon" or anything to that effect?</p> <p>2 MS. BOLGER: Object to the form.</p> <p>3 THE WITNESS: I think it's --</p> <p>4 seeing this in the broader context would be</p> <p>5 important.</p> <p>6 BY MR. BISS:</p> <p>7 Q You acknowledge it doesn't say that</p> <p>8 Jack Flynn -- the tweet doesn't say that Jack</p> <p>9 Flynn is an adherent to the QAnon movement or</p> <p>10 that he supports QAnon or any words to that</p> <p>11 effect; correct?</p> <p>12 MS. BOLGER: Objection to the</p> <p>13 form. It says what it says. You don't need</p> <p>14 Mr. O'Sullivan to read it to you.</p> <p>15 THE WITNESS: In this tweet he's</p> <p>16 sharing a gigantic Q with the QAnon slogan.</p> <p>17 (Exhibit 35 was marked.)</p> <p>18 BY MR. BISS:</p> <p>19 Q Mr. O'Sullivan, I hand you a document</p> <p>20 marked as Exhibit 35. Have you ever seen this</p> <p>21 tweet by Jack Flynn before?</p> <p>22 A Yes.</p> <p>23 Q Or these tweets by Jack Flynn before?</p> <p>24 A Yeah.</p> <p>25 Q When was the first time you ever saw</p>	<p style="text-align: right;">Page 272</p> <p>1 This being now at this point it's six-seven</p> <p>2 weeks after he appeared in the video taking</p> <p>3 a pledge with that slogan, he's still using</p> <p>4 it.</p> <p>5 BY MR. BISS:</p> <p>6 Q Do you know why Jack Flynn used the</p> <p>7 language in these tweets? Why he tweeted out the</p> <p>8 content that he did?</p> <p>9 A I can't speak to that.</p> <p>10 (Exhibit 36 was marked.)</p> <p>11 Q Mr. O'Sullivan, I'll hand you a</p> <p>12 document I've marked as Exhibit 36. This is a</p> <p>13 retweet by Jack Flynn. Looks like it's a retweet</p> <p>14 of a tweet dated -- I can't tell what date it is.</p> <p>15 Have you ever seen this document</p> <p>16 before?</p> <p>17 A I think so.</p> <p>18 Q When was the first time you saw it?</p> <p>19 A I don't recall.</p> <p>20 Q What was the context in which you saw</p> <p>21 it?</p> <p>22 A I don't recall.</p> <p>23 Q Was it to prepare for the deposition?</p> <p>24 A I can't say for certain.</p> <p>25 Q Do you recall seeing it before you</p>
<p style="text-align: right;">Page 271</p> <p>1 them?</p> <p>2 A I don't recall.</p> <p>3 Q The first tweet is dated August 21st,</p> <p>4 2020. Is it your testimony that this tweet</p> <p>5 somehow demonstrates that Jack Flynn is an</p> <p>6 adherent to the QAnon belief system?</p> <p>7 MS. BOLGER: Object to the form.</p> <p>8 THE WITNESS: So these are two</p> <p>9 tweets, one of which includes the QAnon</p> <p>10 slogan "Where we go one, we go all." And</p> <p>11 again, it seems to be describing how</p> <p>12 followers of QAnon, people who like QAnon,</p> <p>13 don't seem to be bad folks.</p> <p>14 BY MR. BISS:</p> <p>15 Q So how is that evidence that Jack</p> <p>16 Flynn is adhering to the QAnon belief system,</p> <p>17 just saying they're not bad folks?</p> <p>18 MS. BOLGER: Object to the form.</p> <p>19 THE WITNESS: I didn't make that</p> <p>20 claim. This tweet just again seems to fit</p> <p>21 into a pattern of tweets that appear to</p> <p>22 be -- that you show me that appear to be</p> <p>23 complimentary to people that like QAnon.</p> <p>24 Even throws in the QAnon slogan in there for</p> <p>25 good measure, "Where we go one, we go all."</p>	<p style="text-align: right;">Page 273</p> <p>1 published the February 4, 2021 report?</p> <p>2 A I can't say for certain. Also, this</p> <p>3 tweet doesn't have a date on it. It's difficult.</p> <p>4 Q So I wanted -- I just want to ask you</p> <p>5 one question about the QAnon column.</p> <p>6 First, do you know why Jack Flynn</p> <p>7 retweeted this tweet?</p> <p>8 A I do not, but again, it seems to be in</p> <p>9 a pattern of tweets that appear to be</p> <p>10 highlighting what's purportedly good about QAnon.</p> <p>11 Q Because every one of Jack Flynn's</p> <p>12 retweets you interpret as a QAnon tweet; isn't</p> <p>13 that -- today, every one you've done. Are you</p> <p>14 aware of that?</p> <p>15 MS. BOLGER: Object to the form.</p> <p>16 THE WITNESS: No. That's not the</p> <p>17 case. That is false. And a lot of the</p> <p>18 tweets you are choosing to show me here just</p> <p>19 happen to be that.</p> <p>20 BY MR. BISS:</p> <p>21 Q The QAnon column where it says</p> <p>22 "Beliefs"; do you see that?</p> <p>23 A Uh-huh.</p> <p>24 Q Individual freedom. Is it -- do you</p> <p>25 believe that's a QAnon belief?</p>

<p style="text-align: right;">Page 274</p> <p>1 A No. I mean, in this document it's 2 stated as such, but you can believe in individual 3 freedom without being a Q follower. I believe 4 this column is quite absurd. It says, "Mission: 5 Exposing corruption. Exposing evil, including 6 child trafficking." We know from actual, real 7 child organizations helping children that 8 believers in this kind of stuff have actually 9 been hindering their work. 10 Exposing deception, preserving freedom 11 weapons, keyboards, memes. Again, points to the 12 importance of sharing memes like #Take the Oath. 13 Like the giant Q that you showed me in a previous 14 post that was shared by Jack Flynn. This is just 15 ridiculous, this column. 16 Q You're aware that Jack Flynn didn't 17 write this tweet? You're aware of that? 18 A I am, yes. 19 Q You acknowledge that that's what a 20 retweet is? 21 MS. BOLGER: Object to form. 22 Q You understand that? 23 A I do. 24 Q The beliefs, individual freedom, you 25 said that's not a QAnon belief. That's a</p>	<p style="text-align: right;">Page 276</p> <p>1 A Well, according to this post that Jack 2 Flynn retweeted, that is a QAnon belief. 3 Q According to the poster. According to 4 the account person, Angel Aura? 5 A According to the post that Jack Flynn 6 retweeted, yes. It's the same thing. 7 Q Corruption and evil are pervasive, 8 that's a QAnon belief or universal belief? 9 A According to this post that Jack Flynn 10 retweeted, it is a QAnon belief. 11 Q Child trafficking is endemic; is that 12 part of the QAnon belief system? 13 A According to this post that Jack Flynn 14 retweeted, yes. 15 Q I'm not asking you about what the post 16 says. Is it part of the QAnon belief system? 17 A In some form it could be, yeah. 18 Q How about "The media is corrupt," is 19 that part of the QAnon belief system? 20 A According to this post retweeted by 21 Jack Flynn, that is what it says here, yes. I 22 think plenty of people who are not QAnon 23 followers also think the media is corrupt. 24 Q A lot of people do. So is "The media 25 is corrupt," is that part of the QAnon belief</p>
<p style="text-align: right;">Page 275</p> <p>1 universal belief; fair? 2 A I would think that that's a universal 3 belief, but Jack Flynn chooses to -- Jack Flynn 4 chose to retweet a post that says it's a QAnon 5 belief. 6 Q How about "question everything"? 7 A Again, Jack Flynn tweeted -- retweeted 8 a post that said that's a QAnon belief in black 9 and white. 10 Q Hold on. "Question everything," is 11 that a QAnon belief? 12 A You skipped "Where we go one, we go 13 all." 14 Q That's where I'm going to come to 15 last. "Question everything," is that a QAnon 16 belief? 17 A "Question everything" is a phrase that 18 is sometimes used in the QAnon community. I 19 think people can question everything all they 20 want and not be QAnon believers. But, again, 21 Jack Flynn retweeted this post which says it's a 22 QAnon belief. 23 Q Okay. "Corruption and evil are 24 pervasive," is that a QAnon belief or just a 25 universal belief?</p>	<p style="text-align: right;">Page 277</p> <p>1 system? Forget what the post says. I heard you 2 already. 3 A The post that you're asking me about? 4 Q Forget what this post says. 5 A But you asked me about this post. 6 Q I'm asking you generally, is "The 7 media is corrupt," is that part of the QAnon 8 belief system? 9 MS. BOLGER: Object to the form. 10 THE WITNESS: According to this 11 document? 12 BY MR. BISS: 13 Q No, not according to this document. 14 A That Jack Flynn reposted, it says that 15 that is a QAnon belief. It can also, in my view, 16 as I already stated, can be a belief that people 17 have who don't follow QAnon. 18 Q It could be a QAnon belief? 19 MS. BOLGER: Object to the form. 20 BY MR. BISS: 21 Q It might not be a QAnon belief? What 22 is it? 23 MS. BOLGER: Object to form. 24 Asked and answered a lot. 25</p>

<p style="text-align: right;">Page 278</p> <p>1 BY MR. BISS:</p> <p>2 Q I just need to be very clear with you.</p> <p>3 Forget what this post says. Is "The media is</p> <p>4 corrupt," is that part of the QAnon belief</p> <p>5 system?</p> <p>6 MS. BOLGER: Object to the form.</p> <p>7 Asked and answered.</p> <p>8 THE WITNESS: I've answered that</p> <p>9 question already.</p> <p>10 MR. BISS: Will you mark that</p> <p>11 portion of the transcript.</p> <p>12 BY MR. BISS:</p> <p>13 Q "WWGIWGA (unity)," is that part of the</p> <p>14 QAnon belief system?</p> <p>15 A There it says it in black and white,</p> <p>16 yes.</p> <p>17 Q You would agree, then, that the phrase</p> <p>18 "Where we go one, we go all" is an expression of</p> <p>19 unity? You would agree with that?</p> <p>20 MS. BOLGER: Object to the form.</p> <p>21 That's not what he testified.</p> <p>22 THE WITNESS: No. It's -- it --</p> <p>23 it's an expression of unity within the QAnon</p> <p>24 world.</p> <p>25</p>	<p style="text-align: right;">Page 280</p> <p>1 Q I and you a copy of a document that I</p> <p>2 marked as Exhibit 38. It's a retweet by Jack</p> <p>3 Flynn --</p> <p>4 MS. BOLGER: Give me just a</p> <p>5 second, please, to catch up.</p> <p>6 Okay.</p> <p>7 BY MR. BISS:</p> <p>8 Q -- dated September 16.</p> <p>9 Have you ever seen it before?</p> <p>10 A It looks familiar.</p> <p>11 Q Do you know anyone by the name of</p> <p>12 Veronica P. Wolski?</p> <p>13 A Is that the lady in this picture? She</p> <p>14 looks familiar to me.</p> <p>15 Q That is the lady in the picture. She</p> <p>16 is the person who Jack Flynn retweeted.</p> <p>17 A Yeah. I think I've seen this. As</p> <p>18 mentioned in her tweet, she stands on a bridge</p> <p>19 occasionally.</p> <p>20 Q Is she a QAnon follower, in your view?</p> <p>21 A I don't know a lot about Veronica, but</p> <p>22 she is wearing a hat that says Q and a T-shirt</p> <p>23 that says, "We are The Storm."</p> <p>24 Q Does that make her a QAnon follower?</p> <p>25 A Could certainly suggest she might be.</p>
<p style="text-align: right;">Page 279</p> <p>1 BY MR. BISS:</p> <p>2 Q So it's --</p> <p>3 MS. BOLGER: He's answering.</p> <p>4 THE WITNESS: It's a QAnon slogan</p> <p>5 which also he posted in this Jack Flynn</p> <p>6 retweet.</p> <p>7 BY MR. BISS:</p> <p>8 Q Is it an expression of unity, "Where</p> <p>9 we go one, we go all"?</p> <p>10 A I just said It's an expression of</p> <p>11 unity within the QAnon.</p> <p>12 Q How about outside the QAnon?</p> <p>13 A I haven't heard it used in that</p> <p>14 context.</p> <p>15 Q You never heard it used outside the</p> <p>16 QAnon movement?</p> <p>17 A I can't say that for certain, but the</p> <p>18 context matters, and in this case the post you're</p> <p>19 asking me about states it was part of QAnon.</p> <p>20 (Exhibit 37 was marked.)</p> <p>21 Q Mr. O'Sullivan, I'm handing you</p> <p>22 document 37. It's a tweet by Jack Flynn dated</p> <p>23 August 23, 2020. Have you ever seen it before?</p> <p>24 A I don't think so.</p> <p>25 (Exhibit 38 was marked.)</p>	<p style="text-align: right;">Page 281</p> <p>1 Q Is that anything but speculation?</p> <p>2 MS. BOLGER: Object to the form.</p> <p>3 Argumentative.</p> <p>4 BY MR. BISS:</p> <p>5 Q Do you know what she believes in?</p> <p>6 A I can't speak for her. I can only say</p> <p>7 that she's wearing a Q hat and she's wearing a</p> <p>8 T-shirt that says, "We are The Storm." Both of</p> <p>9 those, that statement and that letter in that</p> <p>10 way, you know, could be two possible indicators</p> <p>11 that somebody likes QAnon.</p> <p>12 Q But otherwise you don't know anything</p> <p>13 about her?</p> <p>14 MS. BOLGER: Objection to form.</p> <p>15 THE WITNESS: I think I've read a</p> <p>16 bit about her before.</p> <p>17 BY MR. BISS:</p> <p>18 Q Have you ever interviewed her?</p> <p>19 A I don't recall. I don't think so.</p> <p>20 Q Do you know what the hashtag The</p> <p>21 People's Bridge means?</p> <p>22 A That's the bridge she campaigns on, I</p> <p>23 think. Possibly.</p> <p>24 Q What does she campaign for?</p> <p>25 A I don't know.</p>

<p style="text-align: right;">Page 282</p> <p>1 Q Hashtag Patriot Road Trip, do you know 2 what that's referring to? 3 A No. 4 (Exhibit 39 was marked.) 5 Q Mr. O'Sullivan, I hand you a copy of a 6 tweet by Jack Flynn dated September 26, 2020. 7 Have you ever seen this document 8 before? 9 A Yes, I think so. 10 Q All right. You have no doubt in your 11 mind, do you, that Jack Flynn rejected the QAnon 12 belief that Robert Kennedy, Jr. was alive? 13 MS. BOLGER: Object to the form of 14 the question. 15 THE WITNESS: John Kennedy, Jr.? 16 BY MR. BISS: 17 Q John Kennedy. There's no doubt in 18 your mind that Jack Flynn rejects the belief that 19 John Kennedy, Jr. survived the plane crash? 20 MS. BOLGER: Object to the form. 21 BY MR. BISS: 22 Q Is there? 23 A This tweet that you showed me says, 24 "But I beyond a shadow of a doubt, he, his wife 25 and her sister died in a plane crash off the</p>	<p style="text-align: right;">Page 284</p> <p>1 is a singer who performed at that QAnon event I 2 was at in Arizona. 3 Q So my question was not that, but I 4 appreciate you offering those facts voluntarily. 5 MS. BOLGER: Object to the form. 6 That's not what he did. Come on. 7 MR. BISS: That's exactly what he 8 did. 9 MS. BOLGER: Do not badger the 10 witness. 11 BY MR. BISS: 12 Q Do you know where the phrase 13 "beautiful black sky" came from? 14 MR. BISS: You must not be 15 listening. 16 MS. BOLGER: Asked and answered, 17 Steven. Asked and answered. 18 BY MR. BISS: 19 Q Do you know where the phrase 20 "beautiful black sky" came from? 21 MS. BOLGER: Asked and answered. 22 THE WITNESS: Not that I recall. 23 BY MR. BISS: 24 Q Take a look at the second page. 25 A Very nice picture.</p>
<p style="text-align: right;">Page 283</p> <p>1 vineyard." 2 So he seems to be suggesting here 3 that, yes, John Kennedy, Jr. is dead, which, of 4 course, a lot of QAnon followers believe. Again, 5 as we say, QAnon believers don't all believe the 6 same thing. 7 (Exhibit 40 was marked.) 8 Q I'm handing you a document I've marked 9 as Exhibit 40. It's a two-page document. Have 10 you seen either page? 11 A No, I don't think so. 12 Q So the first page is a tweet by Jack 13 Flynn. I don't know the date of the tweet, but 14 it makes reference to "beautiful black sky"; do 15 you see that? 16 A Yeah. 17 Q I think it's -- he's actually quoting 18 from a song called Beautiful Black Sky. 19 Is the phrase "beautiful black sky" or 20 #beautiful black sky a QAnon phrase or a QAnon 21 slogan? 22 A I'm not sure. 23 Q Do you know where the phrase 24 "beautiful black sky" came from? 25 A This tweet says J.T. Wilde, who I know</p>	<p style="text-align: right;">Page 285</p> <p>1 Q It's a good picture of a beautiful 2 black sky, isn't it? 3 MS. BOLGER: Objection to form. 4 THE WITNESS: The image is in 5 black and white. It appears to be a dark 6 sky. 7 BY MR. BISS: 8 Q All right. 9 A Is that Rhode Island? 10 Q That would be Rhode Island. 11 A It looks beautiful. 12 Q All right, sir. 13 (Exhibit 41 was marked.) 14 I'll hand you a document I've marked 15 Exhibit 41. This is a two retweets by Jack 16 Flynn. Have you ever seen these documents before 17 today? 18 A I don't think so. 19 Q Do you know why Jack Flynn retweeted 20 somebody by the name of Trumpress and somebody 21 by the name of Harmeet K. Dhillon? 22 A No. 23 (Exhibit 42 was marked.) 24 Q I'll hand you a document that I've 25 marked as Exhibit 42. This is a tweet by Jack</p>

<p style="text-align: right;">Page 286</p> <p>1 Flynn dated January 7, 2021. Have you ever seen 2 this before today? 3 A I think I have, yeah. 4 (Exhibit 43 was marked.) 5 Q I'll hand you a document I've marked 6 as Exhibit 43, and this is a copy of a direct 7 message from the account -- Twitter account of Go 8 Jack Flynn 1. 9 Have you ever seen this document 10 before today? 11 A No. 12 MS. BOLGER: I don't think I have, 13 and I think this would have been directly in 14 response to our request, so I would expect 15 this to be produced to me in its native 16 form. 17 MR. BISS: You're not reading the 18 documents. It's obvious. 19 BY MR. BISS: 20 Q Have you had -- can you just take a 21 read of this document and tell me if there's any 22 doubt in your mind that -- about the purpose and 23 the effect of the video of the Flynn's taking the 24 Constitutional oath on July 4? 25 MS. BOLGER: Who's making these</p>	<p style="text-align: right;">Page 288</p> <p>1 days after the Q persona called for people to 2 take an oath, including a hashtag Take The Oath, 3 which the Flynn's reposted, and of course the oath 4 included the QAnon slogan "Where we go one, we go 5 all." 6 Q And do you have any other evidence 7 other than the fact that there was a Q drop ten 8 days or so before? 9 MS. BOLGER: Object to the form. 10 THE WITNESS: I mean, many of the 11 tweets you showed me today include reposts 12 of the QAnon slogan. 13 BY MR. BISS: 14 Q Do you have any other evidence that 15 the video taken on July 4, 2020 included a QAnon 16 slogan? 17 A The post by Michael Flynn includes the 18 hashtag that was used in the Q drop. The oath 19 including the line "Where we go one, we go all," 20 which is what makes the oath relevant to QAnon. 21 We've obviously seen a lot of tweets from the 22 Flynn's talking about the QAnon slogan or 23 mentioning the QAnon slogan. Also merchandise 24 being sold with the "Where we go one, we go all" 25 slogan.</p>
<p style="text-align: right;">Page 287</p> <p>1 statements? 2 BY MR. BISS: 3 Q So I'll let you know, in the body of 4 this direct message somebody writes to Jack 5 Flynn, Jack Flynn replies with the portion of the 6 direct messages which are highlighted, and then 7 the other person replies back. So look at the 8 one that's dated -- that's timestamped 2:12 p.m. 9 A Are you talking about the message that 10 begins, "That videotape"? 11 Q Yes, sir, I am. 12 MS. BOLGER: What's the question? 13 BY MR. BISS: 14 Q Go ahead and read that. My question 15 is -- this is a direct message from Jack Flynn on 16 February 6, 2021. This is two days after the 17 first publication of your report. My question 18 is, do you doubt that the video that was taken on 19 July 4, 2020 was what Jack Flynn represents it to 20 be here? 21 MS. BOLGER: Object to the form. 22 BY MR. BISS: 23 Q Do you have any evidence to dispute 24 Jack Flynn's view? 25 A The video posted on July 4 came ten</p>	<p style="text-align: right;">Page 289</p> <p>1 Jack Flynn, October 2020, he's 2 resharing a Q drop on Twitter. 3 MR. BISS: We've never seen that. 4 Hopefully that will be produced before 5 discovery closes or you won't be able to use 6 it. 7 MS. BOLGER: That is completely 8 untrue. Carry on. 9 MR. BISS: We'll see. 10 BY MR. BISS: 11 Q Let me try to rephrase my question. 12 Jack Flynn writes here, "Since we are 13 all family, the statement Where we go one, we go 14 all means a lot to us all, given the battle over 15 the last four years and how the families stick 16 together to fight back. That was our 4th of July 17 cookout at my house," and it goes on. 18 Do you have any evidence to dispute 19 that the phrase "Where we go one, we go all" was 20 a statement of family solidarity and unity? Do 21 you have any evidence to dispute Jack Flynn's 22 view? 23 MS. BOLGER: Object to the form. 24 Asked and answered. 25 THE WITNESS: It's widely known</p>

<p style="text-align: right;">Page 290</p> <p>1 that it's the QAnon slogan. 2 (Exhibit 44 was marked.) 3 BY MR. BISS: 4 Q I'll show you a document I've marked 5 as Exhibit 44. This is a tweet from Leslie Flynn 6 dated May 9, 2020. It states, "Hey, go Jack 7 Flynn. You forgot me." Four exclamation points. 8 Have you ever seen this document 9 before today? 10 A I think so. 11 Q Do you have -- have you ever seen any 12 evidence that Leslie Flynn is a QAnon follower or 13 that she ever was an adherent to any QAnon belief 14 system? 15 MS. BOLGER: For the record, the 16 document says references two other tweets 17 that were deleted and from a suspended 18 account. 19 MR. BISS: Okay. 20 THE WITNESS: These do not say 21 Leslie Flynn was a QAnon follower. She was 22 in the video taking the QAnon oath that 23 included a QAnon slogan. 24 BY MR. BISS: 25 Q Do you have any other evidence that</p>	<p style="text-align: right;">Page 292</p> <p>1 had left. 2 MR. BISS: Does that include all 3 the breaks that you took? 4 MS. BOLGER: Of course it does not 5 include the breaks. 6 MR. BISS: I've got a few more 7 exhibits. 8 MS. BOLGER: Hold on. Under the 9 court rules they say seven hours. I'm 10 asking if you intend to be done within seven 11 hours. 12 MR. BISS: I intend to be done in 13 seven hours. 14 BY MR. BISS: 15 Q Mr. O'Sullivan, I'd like you to turn 16 to the sixth page of this particular email chain, 17 and it's an email from Joe Flynn, that's 18 jflynn064@gmail.com to a Roger Richards. It's 19 dated September 24, 2020 at 1:51 p.m. 20 Do you see that? 21 A Yes. 22 Q And Mr. Joe Flynn writes, quote, "A 23 couple of things. I am not against Q but I am 24 not a Q follower. I am a Q observer is probably 25 best way to describe me. So let's keep questions</p>
<p style="text-align: right;">Page 291</p> <p>1 Leslie Flynn was ever an adherent to any QAnon 2 belief system? 3 A We did not allege that. I know that 4 there's also some tweets that she liked that 5 included some QAnon iconography. 6 Q Where did you see those tweets? 7 A As part of this process. 8 Q Part of preparing for the deposition? 9 MS. BOLGER: Objection to form. 10 THE WITNESS: Correct. 11 BY MR. BISS: 12 Q Did you ever see those tweets or any 13 tweets by Leslie Flynn before you published the 14 February 4, 2021 report? 15 A I can't say for certain, but obviously 16 she was in the QAnon video that was posted by the 17 Flynn. 18 (Exhibit 45 was marked.) 19 Q Okay. I'll show you a document I've 20 marked as Exhibit 45. 21 MS. BOLGER: While Mr. O'Sullivan 22 takes a look, it looks like we're running 23 about six hours, 15-20 minutes. And I don't 24 know how much you have left, and I was 25 wondering if you had a sense of how much you</p>	<p style="text-align: right;">Page 293</p> <p>1 focused on Jen Flynn case, okay? I would like to 2 steer clear of a conversation about Q." 3 You see that? 4 A Yes. 5 Q After reading that, do you have any 6 question in your mind whether Joe Flynn is a Q 7 follower? 8 MS. BOLGER: Object to the form. 9 THE WITNESS: We didn't allege he 10 was a Q follower. As he states here, "I'm a 11 Q observer." Publicly, of course, we've 12 seen him repeatedly share the QAnon slogan 13 and take the QAnon oath. 14 BY MR. BISS: 15 Q Where publicly did you ever see him 16 share the QAnon slogan? 17 A On his social media. 18 Q Where? What date? When did he do it? 19 A I mean, we saw multiple instances. 20 Q Joe Flynn? 21 A Oh, excuse me. Sorry. I thought this 22 email -- sorry, I just saw JFlynn064. Joe Flynn. 23 Sorry, I thought this was in relation to Jack 24 Flynn. 25 As far as I can recall, Joe Flynn I</p>

<p style="text-align: right;">Page 294</p> <p>1 believe had shared some -- had shared QAnon 2 iconography or slogans on social media. 3 Q Can you identify any today? 4 MS. BOLGER: Object to the form. 5 THE WITNESS: Not to my 6 recollection. 7 BY MR. BISS: 8 Q Can you identify the date or the 9 substance? Anything about these so-called social 10 media posts? 11 MS. BOLGER: Objection to form. 12 THE WITNESS: He was, of course, 13 in the QAnon pledge video. 14 BY MR. BISS: 15 Q I know about that, but I'm talking 16 about the social media posts. 17 A I can't recall. 18 Q But in any case, Joe Flynn very 19 clearly states, "I am not a Q follower"; do you 20 see that? 21 A I see that, yes. 22 Q Had you bothered to call Joe Flynn, do 23 you think that he would have told you anything 24 different? 25 MS. BOLGER: Object to the form.</p>	<p style="text-align: right;">Page 296</p> <p>1 MS. BOLGER: I mean, they could 2 have said it to CNN, which there's no 3 evidence they did. 4 BY MR. BISS: 5 Q And a reporter could have called for a 6 comment, right, Mr. O'Sullivan? You could have 7 called Joe Flynn? 8 A We didn't call him a QAnon follower in 9 my report. 10 Q You could have called Joe Flynn, but 11 you chose not to; right? 12 A We didn't call him a QAnon follower in 13 our report. 14 Q You chose not to call Joe Flynn in 15 connection with the February 4, 2021 report; 16 isn't that true? 17 A We didn't call him a QAnon follower. 18 MR. BISS: Would you mark that 19 place in the transcript. Thank you. 20 (Exhibit 46 was marked.) 21 BY MR. BISS: 22 Q I'll show you a document marked as 23 Exhibit 46. This is a one-page text message, 24 chain of a text message communication between Joe 25 Flynn and somebody by the name of Tracy Beanz or</p>
<p style="text-align: right;">Page 295</p> <p>1 Joe Flynn is not a plaintiff here. 2 You can answer it. 3 THE WITNESS: We had the statement 4 from Sidney Powell. 5 BY MR. BISS: 6 Q Anything else? 7 A About? 8 Q About Joe Flynn. Do you think Joe 9 Flynn would have told you -- if you bothered to 10 call him, do you think Joe Flynn would have 11 admitted that he was a QAnon follower after 12 stating in writing, quote, "I am not a Q 13 follower"? 14 MS. BOLGER: Object to the form. 15 You have the timeline completely wrong. 16 Go ahead. 17 THE WITNESS: We didn't call him a 18 QAnon follower. 19 BY MR. BISS: 20 Q In September of 2020 he says, "I am 21 not a Q follower." How much clearer does it have 22 to be for CNN? "I am not a Q follower. I am not 23 a Q follower. I am not a Q follower." How much 24 clearer does it have to be before CNN says, "Joe 25 Flynn is not a Q follower"?</p>	<p style="text-align: right;">Page 297</p> <p>1 Tracy Diaz. 2 Did you see this report before today? 3 A No. 4 Q So you see in the text message chain 5 where Tracy Beanz says, "Fantastic. I'm working 6 on the plan. Trust it." Do you see the emoji 7 there? 8 A Uh-huh. 9 Q It's that same emoji, the laughing 10 emoji till you cry. 11 "I am excited." 12 Joe Flynn tweets back, "WWG1WGA," 13 American flag, thumbs up, the muscles thing, 14 American flag. Then he has two emojis, two 15 laughing till you cry emojis. 16 Then Tracy Beanz writes back, "I think 17 that's pronounced "bwahahaha." 18 Do you see that? 19 A Yes. 20 Q Were you aware that Joe Flynn and 21 Tracy Beanz were mocking QAnon? 22 MS. BOLGER: Objection to form. 23 That misstates the document. 24 MR. BISS: You really think that 25 misstates the document?</p>

<p style="text-align: right;">Page 298</p> <p>1 BY MR. BISS:</p> <p>2 Q Do you have any evidence that would</p> <p>3 show, Mr. O'Sullivan, that Joe Flynn and/or Tracy</p> <p>4 Beanz ever subscribed to the "trust the plan"</p> <p>5 part of the QAnon belief system?</p> <p>6 A I'm only seeing one segment of the</p> <p>7 conversation here.</p> <p>8 (Exhibit 47 was marked.)</p> <p>9 Q I'll show you a document I've marked</p> <p>10 as Exhibit 47. This is a document that was</p> <p>11 produced in discovery by Lori Flynn. It's a</p> <p>12 message of some kind, I believe on Facebook or</p> <p>13 Instagram, of a message between Lori Flynn and</p> <p>14 Valerie Flynn. It's dated June 30, 2020. It</p> <p>15 says, "Take the oath! Pass it on!"</p> <p>16 Do you see that?</p> <p>17 A Yes.</p> <p>18 Q Have you ever seen this document</p> <p>19 before today?</p> <p>20 A No.</p> <p>21 Q Do you believe that this document</p> <p>22 evidences an adherence by Lori Flynn to the QAnon</p> <p>23 belief system?</p> <p>24 MS. BOLGER: For the record, the</p> <p>25 witness said he's never seen the document</p>	<p style="text-align: right;">Page 300</p> <p>1 evidence; right?</p> <p>2 MS. BOLGER: Object to form.</p> <p>3 THE WITNESS: I said the</p> <p>4 information I have.</p> <p>5 BY MR. BISS:</p> <p>6 Q The only information you have is she</p> <p>7 appeared in the video ten days after this Q drop,</p> <p>8 but you have no evidence that she ever saw the Q</p> <p>9 drop?</p> <p>10 MS. BOLGER: Object to the form.</p> <p>11 THE WITNESS: As I said, she's in</p> <p>12 the video and also sent this message about</p> <p>13 an oath.</p> <p>14 BY MR. BISS:</p> <p>15 Q Do you have any evidence that she saw</p> <p>16 the Q drop? What's so hard about answering that</p> <p>17 question?</p> <p>18 MS. BOLGER: Objection to form.</p> <p>19 Asked and answered.</p> <p>20 You can answer it again.</p> <p>21 BY MR. BISS:</p> <p>22 Q Do you have any evidence that she ever</p> <p>23 saw the Q drop; yes or no?</p> <p>24 MS. BOLGER: Object to the form.</p> <p>25 THE WITNESS: Again, we didn't</p>
<p style="text-align: right;">Page 299</p> <p>1 before. He has no context.</p> <p>2 You can answer the question if you</p> <p>3 can.</p> <p>4 THE WITNESS: Yeah, I mean, I</p> <p>5 don't see the further context of this. I</p> <p>6 would just obviously note this message seems</p> <p>7 to be about six days after the Q persona</p> <p>8 told people to take an oath and a few days</p> <p>9 before Lori and Valerie Flynn appeared in a</p> <p>10 video taking an oath that includes the QAnon</p> <p>11 slogan.</p> <p>12 BY MR. BISS:</p> <p>13 Q I think I asked you this before, but</p> <p>14 just to be clear, you don't have any evidence</p> <p>15 that Lori Flynn saw that Q drop, do you?</p> <p>16 MS. BOLGER: Object to the form.</p> <p>17 THE WITNESS: All I know is that</p> <p>18 she appeared in a video taking the QAnon</p> <p>19 oath and also sent this message six days</p> <p>20 after.</p> <p>21 BY MR. BISS:</p> <p>22 Q The answer is --</p> <p>23 MS. BOLGER: Let him answer.</p> <p>24 BY MR. BISS:</p> <p>25 Q The answer is you don't have any</p>	<p style="text-align: right;">Page 301</p> <p>1 call her a QAnon follower, but she is in the</p> <p>2 QAnon video.</p> <p>3 MR. BISS: Can you please mark</p> <p>4 that portion of the transcript.</p> <p>5 BY MR. BISS:</p> <p>6 Q Do you have any evidence that Valerie</p> <p>7 Flynn ever saw that Q drop?</p> <p>8 A Again, she's in the QAnon pledge video</p> <p>9 and is part of this conversation that you've</p> <p>10 shown me, which came just a few days after the Q</p> <p>11 post about taking an oath.</p> <p>12 Q I take it you're just not going to</p> <p>13 answer whether you have any evidence if Valerie</p> <p>14 Flynn saw the Q drop?</p> <p>15 MS. BOLGER: That's not a proper</p> <p>16 question.</p> <p>17 MR. BISS: It's totally a proper</p> <p>18 question. Can you mark that place as well.</p> <p>19 MS. BOLGER: The witness didn't</p> <p>20 refuse to answer it. You can't mark it.</p> <p>21 MR. BISS: Of course he refused.</p> <p>22 MS. BOLGER: No, he didn't.</p> <p>23 MR. BISS: And you're subordinate.</p> <p>24 MS. BOLGER: He can answer that</p> <p>25 question, that crazy, improper question I</p>

<p style="text-align: right;">Page 302</p> <p>1 was objecting to, which was, I think, are</p> <p>2 you going to keep saying the same thing over</p> <p>3 and over, but I don't know.</p> <p>4 BY MR. BISS:</p> <p>5 Q I've handed you a document. I'm not</p> <p>6 wasting --</p> <p>7 MS. BOLGER: Steve, do you want an</p> <p>8 answer to the question?</p> <p>9 MR. BISS: I'm going to the court.</p> <p>10 I'm not wasting my time with you anymore.</p> <p>11 MS. BOLGER: The witness will</p> <p>12 answer the question.</p> <p>13 MR. BISS: I'm sorry, Kate, I've</p> <p>14 asked it too many times, and you have</p> <p>15 facilitated this.</p> <p>16 (Exhibit 48 was marked.)</p> <p>17 BY MR. BISS:</p> <p>18 Q Exhibit 48 I've handed to you. Have</p> <p>19 you ever seen this document before today?</p> <p>20 MS. BOLGER: Can I have a copy of</p> <p>21 it, please?</p> <p>22 And don't answer a question 'til I</p> <p>23 see it. Thank you.</p> <p>24 THE WITNESS: No, I don't think</p> <p>25 so.</p>	<p style="text-align: right;">Page 304</p> <p>1 about her. I think she got fired by Fox</p> <p>2 News recently, or Fox.</p> <p>3 BY MR. BISS:</p> <p>4 Q You're aware that she used to work for</p> <p>5 CBS News a long time, 60 Minutes? You're aware</p> <p>6 of that?</p> <p>7 MS. BOLGER: Objection to form.</p> <p>8 THE WITNESS: I couldn't say that</p> <p>9 for certain, but I trust you.</p> <p>10 BY MR. BISS:</p> <p>11 Q All you recall is the bad things.</p> <p>12 That's all you recall? Consistent with your</p> <p>13 behavior during this deposition.</p> <p>14 MS. BOLGER: Hey, Mr. Biss, watch</p> <p>15 it.</p> <p>16 BY MR. BISS:</p> <p>17 Q That's all you remember; right?</p> <p>18 MS. BOLGER: This is not an</p> <p>19 ad hominem attack. This is not an excuse</p> <p>20 for you to beat up on the witness.</p> <p>21 MR. BISS: We're up to 49.</p> <p>22 (Exhibit 49 was marked.)</p> <p>23 BY MR. BISS:</p> <p>24 Q Mr. O'Sullivan, I hand you a document</p> <p>25 that I've marked as Exhibit 49. This is</p>
<p style="text-align: right;">Page 303</p> <p>1 BY MR. BISS:</p> <p>2 Q Okay. This is a document that was</p> <p>3 produced from Lori Flynn and Jack Flynn's</p> <p>4 Instagram account and it refers to a YouTube</p> <p>5 video. The YouTube video was published by</p> <p>6 somebody by the name John Stubbins. It's an</p> <p>7 interview with Lara Logan dated March 12 of 2021.</p> <p>8 Have you ever seen that YouTube video?</p> <p>9 A I don't think so.</p> <p>10 Q Do you know who Lara Logan is?</p> <p>11 A I'm familiar, yes.</p> <p>12 Q And were you aware that she saw your</p> <p>13 report on the Flynn's?</p> <p>14 A I don't think so.</p> <p>15 Q Do you have an opinion as to Lara</p> <p>16 Logan's reputation for truthfulness and veracity</p> <p>17 in the community in which she lives and works?</p> <p>18 MS. BOLGER: Objection, form.</p> <p>19 THE WITNESS: No.</p> <p>20 BY MR. BISS:</p> <p>21 Q You're obviously aware of her</p> <p>22 accomplishments in the area of journalism;</p> <p>23 correct?</p> <p>24 MS. BOLGER: Object to the form.</p> <p>25 THE WITNESS: I don't know a lot</p>	<p style="text-align: right;">Page 305</p> <p>1 represented to be personal messages between Donie</p> <p>2 O'Sullivan and Kelly Bourdet.</p> <p>3 Have you ever seen -- well, who's</p> <p>4 Kelly Bourdet?</p> <p>5 A She was an editor at CNN.</p> <p>6 Q And she was an editor -- was she one</p> <p>7 of your editors on -- back in October of 2020?</p> <p>8 A She would sometimes edit my stories,</p> <p>9 yeah.</p> <p>10 Q These are personal messages that you</p> <p>11 sent? How did you send these to her? What</p> <p>12 system or platform?</p> <p>13 A This looks like Slack.</p> <p>14 MR. BISS: Can I just represent</p> <p>15 it's called personal message because that's</p> <p>16 the channel. The channel is messages</p> <p>17 between Sullivan and Bourdet.</p> <p>18 BY MR. BISS:</p> <p>19 Q Mr. O'Sullivan, I'd rather hear it</p> <p>20 from you than your counsel. Do you agree with</p> <p>21 what she just said?</p> <p>22 A This conversation would be direct</p> <p>23 messages between Kelly and I.</p> <p>24 MS. BOLGER: On Slack.</p> <p>25 THE WITNESS: On Slack.</p>

<p style="text-align: right;">Page 306</p> <p>1 BY MR. BISS:</p> <p>2 Q What is Slack?</p> <p>3 A Slack is a workplace messaging</p> <p>4 service.</p> <p>5 Q Is it like an app on your phone?</p> <p>6 A App on your phone. Also on the</p> <p>7 laptop. Some people use it instead of email.</p> <p>8 Q Fair enough. Is it something that's</p> <p>9 monitored by CNN or is it outside of CNN?</p> <p>10 A It's within CNN.</p> <p>11 Q So there's like a permanent record of</p> <p>12 it?</p> <p>13 A I don't know how the recordkeeping</p> <p>14 works with Slack.</p> <p>15 MS. BOLGER: Steven, I was trying</p> <p>16 to tell you it was a CNN document, not a</p> <p>17 personal document.</p> <p>18 BY MR. BISS:</p> <p>19 Q Did you send these messages to</p> <p>20 Ms. Bourdet, and by the same token did you</p> <p>21 receive them from her, on or about the dates</p> <p>22 indicated on the document?</p> <p>23 MS. BOLGER: Objection.</p> <p>24 THE WITNESS: I believe so, yes.</p> <p>25</p>	<p style="text-align: right;">Page 308</p> <p>1 Q The very last message reads, "Well,</p> <p>2 not without blowing my cover. The fact I was</p> <p>3 wearing a mask was a bit of a red flag, but yeah</p> <p>4 tons of interesting stuff. I have some notes</p> <p>5 from it that I will share around later."</p> <p>6 Do you still have those notes?</p> <p>7 A Yes, and I believe they were produced.</p> <p>8 Q Are they handwritten notes or what</p> <p>9 form are they in?</p> <p>10 A Notes on the iPhone app. On the</p> <p>11 iPhone notes app.</p> <p>12 (Exhibit 50 was marked.)</p> <p>13 Q I've handed you a document produced in</p> <p>14 discovery by CNN. What are these?</p> <p>15 MS. BOLGER: Take a look at the</p> <p>16 whole exhibit. Make sure you know.</p> <p>17 THE WITNESS: So these look to be</p> <p>18 text messages between Philippa Holland and</p> <p>19 I.</p> <p>20 BY MR. BISS:</p> <p>21 Q Who is Philippa Holland?</p> <p>22 A She is a producer on -- was a producer</p> <p>23 at the time on CNN tonight.</p> <p>24 Q All right. And what was the purpose</p> <p>25 of these text messages?</p>
<p style="text-align: right;">Page 307</p> <p>1 BY MR. BISS:</p> <p>2 Q You indicate here -- turn to page CNN</p> <p>3 1109. You indicate here that you felt like the</p> <p>4 opportunity to go to the Q Con Live conference</p> <p>5 was a chance to confront Watkins. What did you</p> <p>6 mean by that?</p> <p>7 MS. BOLGER: Object to the form.</p> <p>8 You can answer.</p> <p>9 THE WITNESS: I heard that -- I</p> <p>10 think this would have been a reference to</p> <p>11 Jim Watkins, who runs 8kun, which is a home</p> <p>12 to -- was a home to Q, and he hadn't been --</p> <p>13 if I recall correctly -- seen publicly for</p> <p>14 quite some time. So I initially thought it</p> <p>15 might be an opportunity to try to interview</p> <p>16 him.</p> <p>17 BY MR. BISS:</p> <p>18 Q When you said "confront him," what did</p> <p>19 you mean by "confront"?</p> <p>20 A To ask him, you know, is he involved</p> <p>21 in QAnon.</p> <p>22 Q Turn to the last page of the exhibit.</p> <p>23 The very last -- what do you call these things,</p> <p>24 messages?</p> <p>25 A Yeah.</p>	<p style="text-align: right;">Page 309</p> <p>1 MS. BOLGER: Object to the form.</p> <p>2 THE WITNESS: She and I would text</p> <p>3 about stories occasionally, and I would</p> <p>4 appear on that show quite a bit. And so</p> <p>5 when I came up with this story idea she was</p> <p>6 kind of the person I thought I should pitch</p> <p>7 it to.</p> <p>8 BY MR. BISS:</p> <p>9 Q The first date on this documents is</p> <p>10 February 1. Is that the date you first came up</p> <p>11 with this story?</p> <p>12 A I can't say for certain.</p> <p>13 Q Okay. First page, CNN 1007, you write</p> <p>14 in the text message, "I wrote a bit about it at</p> <p>15 the time."</p> <p>16 Is it your testimony that you wrote</p> <p>17 about the Q Con Live conference or the matters</p> <p>18 that were discussed at the Q Con Live conference</p> <p>19 back in October of 2020?</p> <p>20 A Yeah. There was an article published</p> <p>21 on CNN.com.</p> <p>22 Q What prompted this idea? What caused</p> <p>23 you to have the idea of writing this script,</p> <p>24 producing this piece in February of 2021?</p> <p>25 A It was just a lot of -- I think a lot</p>

<p style="text-align: right;">Page 310</p> <p>1 of people wanted to better understand how online 2 conspiracy theories have played into what had 3 happened a few weeks earlier at the Capitol. As 4 I was just thinking back over things, I thought 5 that the Q Con event was relevant. 6 Q So turn to the next page, 1071. 7 You write, "Could be a good live 8 segment or even a PKG." See that? 9 A Yeah. 10 Q What's a PKG? 11 A That is shorthand for TV package, 12 which is what eventually this piece turned in to 13 be, like a three-minute package. 14 Q You write a little further below, 15 quote, "Will email ya some stuff later." 16 Did you send that email? 17 A I don't recall. I'm not sure. 18 Q Fair enough. The next bubble she 19 uses -- she says, "Oh wow, Donie," and she goes 20 on, but she uses the letters EP in there. 21 A Yeah. 22 Q Executive producer? Or do you know 23 what she's referring to? 24 A Yeah, I think that's fair to say. It 25 refers to the show's executive producer.</p>	<p style="text-align: right;">Page 312</p> <p>1 are discussing stories, you know, we look at what 2 is happening in the news that week and see, you 3 know, if it's relevant in some way to what's 4 happening, to basically establish more of a news 5 hook, is what they kind of call it. So, yeah, 6 this was kind of an afterthought. 7 Q When did you decide, when did you make 8 the decision to embroil the Flynns in this story? 9 MS. BOLGER: Object to the form. 10 THE WITNESS: The inclusion of the 11 Flynns in my story was important because it 12 showed -- demonstrated how prominent figures 13 like Michael Flynn and Trump had publicly 14 flirted with QAnon. 15 BY MR. BISS: 16 Q Why did you have to involve Jack 17 Flynn, Leslie Flynn, Valerie Flynn and Lori 18 Flynn? 19 A They were in the video that was 20 publicly posted by Michael Flynn. 21 Q Was that the only reason you had to 22 involve them? 23 MS. BOLGER: Object to the form. 24 THE WITNESS: They were in the 25 video and it was widely reported.</p>
<p style="text-align: right;">Page 311</p> <p>1 Q Okay. Turn ahead to 1076. This is an 2 email -- a text message dated February 1, 2021. 3 If you turn to the next Page, 1077, 4 you'll get the full context of it. You begin by 5 saying, "Hope that was okay." Do you see that? 6 For some reason the lawyers have redacted that 7 language as being nonresponsive, but it was 8 captured on 1077. 9 My question to you is if you go down a 10 little further in your text message, you write, 11 "Might take a few days to put together, but think 12 it might be a good one to do before impeachment 13 trial as it shows how much Q followers look to 14 Trump." 15 Do you see that? 16 A Uh-huh. 17 Q And that was -- was that the purpose 18 of this package, this TV package, was to get a 19 piece out there about Trump and QAnon before the 20 impeachment trial? 21 MS. BOLGER: Object to the form. 22 BY MR. BISS: 23 Q Was that your purpose? 24 A No. I mean, as far as I can recall, I 25 came up with the idea, and then oftentimes as we</p>	<p style="text-align: right;">Page 313</p> <p>1 BY MR. BISS: 2 Q Why did you have to include their 3 images? Why couldn't you have redacted their 4 images out? 5 MS. BOLGER: Object to the form. 6 Asked and answered. 7 THE WITNESS: They were in the 8 video that the Flynns themselves publicly 9 posted. 10 BY MR. BISS: 11 Q And you agree that you could have 12 redacted them out of the clip that you showed in 13 the report? You could have done that; right? 14 MS. BOLGER: Object to the form. 15 THE WITNESS: The video had been 16 shared widely across social media by then. 17 BY MR. BISS: 18 Q When you created that clip that you 19 used in your report, you could have redacted the 20 video down to just show General Flynn? You could 21 have done that; right? 22 MS. BOLGER: Objection. Asked and 23 answered. 24 THE WITNESS: We took the video 25 from the Flynn social media.</p>

<p style="text-align: right;">Page 314</p> <p>1 MR. BISS: Mark that portion of 2 the transcript. Thank you. 3 BY MR. BISS: 4 Q Turn to 1078. You write to 5 Ms. Holland, quote, "Emailed ya the QAnon thing. 6 Zero rush but might be something good for Thur, 7 Fri or Mon." 8 Do you see that? 9 A Uh-huh. 10 Q Did you send that email on February 2 11 to Ms. Holland? 12 A I assume so, if I said that. 13 Q Did there come a point in time when 14 Ms. Holland responded to you to indicate that 15 they had approved you going forward with this 16 television package? 17 A That must have happened, yeah. 18 Sometimes -- yeah. 19 Q Take a look at 1083 and 1084. This is 20 the tweet that we looked at earlier. 21 A Yes. 22 Q February 4 tweet, says 9:16 p.m. 23 Does that refresh your recollection as 24 to when you posted the tweet or when you tweeted 25 it?</p>	<p style="text-align: right;">Page 316</p> <p>1 is -- it's clear it's just a bit of fun. 2 Q All right. So just a bit of fun. 3 It's just a joke; right? 4 A My text about this tweet will send 5 ratings skyrocketing? 6 Q Yeah. 7 A Yes. 8 Q Because you knew -- coming into this 9 deposition, you knew that if you had -- if you 10 had produced this report with the idea of sending 11 your ratings skyrocketing, that would look really 12 bad for you? 13 MS. BOLGER: Objection to form. 14 BY MR. BISS: 15 Q That would make you look kind of 16 malicious, that you published all this stuff 17 about the Flynns just to get your ratings up? 18 MS. BOLGER: Object to the form. 19 THE WITNESS: Yeah. I mean, 20 that's -- that's not the way I do my 21 reports. 22 BY MR. BISS: 23 Q Even though it says here, "Obviously 24 this tweet will send ratings skyrocketing," it's 25 your testimony that you did not produce this</p>
<p style="text-align: right;">Page 315</p> <p>1 MS. BOLGER: Object to the form. 2 THE WITNESS: I couldn't tell you 3 the exact time, but the time would be on the 4 tweet. 5 BY MR. BISS: 6 Q Okay. And what was the purpose of you 7 sending the tweet by text message to Ms. Holland? 8 A A joke. Joking with Holland, who's 9 also a friend, where I say, "Obviously this tweet 10 will send ratings skyrocketing." 11 Q So you have a very strange sense of 12 humor. You wrote to her on February 4 at 13 9:16 p.m. and included with this tweet, quote, 14 "Obviously this will tweet will send ratings 15 skyrocketing"? 16 A Yes. 17 Q You're now -- it's now your testimony 18 that you -- that was just a joke? 19 A Yes. I don't think my Twitter account 20 has that sway, unfortunately. 21 Q And she wrote back? 22 A "Huge." 23 Q "Huge" with two exclamation points. 24 "Love it" two exclamation points. 25 A Also, the way she wrote "huge" there</p>	<p style="text-align: right;">Page 317</p> <p>1 report to increase CNN's ratings? 2 A Correct. 3 Q The scandalous report about the Flynns 4 and QAnon, it was not your intent to increase 5 ratings with these allegations that the Flynns 6 were part of a violent domestic insurrectionist 7 group? 8 MS. BOLGER: Object to form. 9 Because you keep adding adjectives doesn't 10 mean you've already asked and answered it. 11 MR. BISS: You've used the most -- 12 MS. BOLGER: You can answer it. 13 Let him answer it. 14 THE WITNESS: I reject that 15 characterization of the piece, but 16 fortunately for me, my time at CNN, you 17 know, they allowed me to do the stories that 18 I think are important, and ratings and 19 things don't come into it at my level. 20 BY MR. BISS: 21 Q Now you know how to use emojis if 22 you're just kidding or joking around. You 23 doesn't use any emojis in your tweet to say that 24 you're joking? 25 A I don't always.</p>

<p style="text-align: right;">Page 318</p> <p>1 Q What was the first time you ever 2 mentioned to somebody you're just kidding around? 3 Just joking? 4 MS. BOLGER: What? 5 BY MR. BISS: 6 Q When was the first time you mentioned 7 to anybody that you were just joking around here 8 in your tweet? 9 MS. BOLGER: I don't understand 10 the question. 11 You can answer it only if you do. 12 THE WITNESS: With that text 13 message? 14 BY MR. BISS: 15 Q Yeah. 16 A It's obvious by the way it's written. 17 Q When did you mention it to anybody 18 that you were just joking around? 19 A I don't understand what you're -- I 20 mean, clearly -- 21 Q It's a simple question. What is it 22 that you don't understand? 23 MS. BOLGER: Hey, watch it. 24 That's the last time you get to talk to him 25 that way. I'll pull the plug right now if</p>	<p style="text-align: right;">Page 320</p> <p>1 it's something that you made up for litigation 2 purposes. Sometimes. Isn't that what you've 3 done? 4 A Absolutely not. 5 Q You've realized this is an Achilles 6 heel for you, and you have concocted the idea now 7 that it's a joke. 8 MS. BOLGER: Donie, you can answer 9 it. 10 THE WITNESS: That's just false. 11 BY MR. BISS: 12 Q Okay. 13 MS. BOLGER: Also, don't accuse my 14 witness of lying. 15 (Exhibit 51 was marked.) 16 BY MR. BISS: 17 Q Mr. O'Sullivan, I've handed you a copy 18 of a document, sir. This is an email from Donie 19 O'Sullivan to Philippa Holland, dated February 2, 20 2021. Did you prepare and send this email to 21 Ms. Holland on February 2, 2021? 22 A I believe so, yes. 23 Q Is the content of the email truthful 24 and accurate? 25 A I believe so, yes.</p>
<p style="text-align: right;">Page 319</p> <p>1 you don't talk nice. 2 MR. BISS: You can do whatever you 3 want to do. 4 MS. BOLGER: Talk nice. 5 MR. BISS: We're going to do court 6 anyway, so you can make whatever record you 7 want to make. 8 BY MR. BISS: 9 Q When was the first time you ever 10 mentioned to anyone that you were just joking 11 around? 12 MS. BOLGER: Object to the form of 13 the question. 14 THE WITNESS: I mean, I think it's 15 clear in the text message that it's a joke. 16 BY MR. BISS: 17 Q And you would agree with me that you 18 don't mention there's any joke here? You don't 19 mention it as being a joke in the text message? 20 MS. BOLGER: Object to the form. 21 THE WITNESS: Sometimes when you 22 have to explain the joke it takes the good 23 out of it. 24 BY MR. BISS: 25 Q Sometimes it's not a joke. Sometimes</p>	<p style="text-align: right;">Page 321</p> <p>1 Q All right. If you look down towards 2 the end, it says, "Here's a sample of what we 3 have. I clipped the stuff myself so excuse the 4 shittiness of it." 5 Do you see that? 6 A Yes. 7 Q All of the clips including the 8 truncated clip of the Flynn family, are you the 9 one who created all those truncated clips? 10 MS. BOLGER: Object to the form. 11 THE WITNESS: I would just point 12 out my inclusion of the word "shittiness" 13 here -- I don't know if that's the correct 14 spelling of it -- would also just point to 15 the relationship -- the good relationship I 16 had with -- I call her Flip Holland, which 17 will again underline the point that we have 18 a good relationship and can joke with each 19 other. 20 This was -- 21 BY MR. BISS: 22 Q Thanks for all that. Appreciate it. 23 MS. BOLGER: Keep going, Donie. 24 BY MR. BISS: 25 Q Do you remember my question?</p>

<p style="text-align: right;">Page 322</p> <p>1 A Yes. These were -- yes. These were, 2 you know, memorable moments from the QAnon 3 convention. 4 Q Did you create the clip of the Flynn 5 family? 6 MS. BOLGER: Object to the form. 7 THE WITNESS: I scripted it. 8 BY MR. BISS: 9 Q Did you create it on your computer? 10 Two-second clip. You obviously deleted the vast 11 majority of the video, the Twitter video? 12 A No. I wouldn't have clipped that. 13 Q Who did? 14 A The editor on the story, but they 15 would have been following my instructions in 16 terms of I scripted it and got it approved 17 through the processes. 18 Q It would have been Ashley Van Sant or 19 Tiffany -- I can't remember her last name. 20 A I don't know who the actual editor -- 21 Ashley is a package producer, so she wouldn't 22 normally -- it's the person sitting in the edit 23 bay would be doing that. 24 Q Who was that, Lee Burack. 25 A I think he was the person on this</p>	<p style="text-align: right;">Page 324</p> <p>1 Q Did you prepare that email on 2 February 2, 2021 and send it to Mr. Davis and 3 Ms. Holland? 4 A I think so, yes. 5 Q Who is Richard Davis? 6 A Richard Davis is the -- kind of in a 7 planning producer role, so with various pieces I 8 would do, he would help make sure other people in 9 the network know about it. 10 Q Okay. And you write to him, "I think 11 this piece will make some news. It demonstrates 12 the Trump Q dynamic in a way that I don't think 13 has been shown before." 14 Do you see that? 15 A Uh-huh. 16 MS. BOLGER: Say yes or no. 17 THE WITNESS: Yes. 18 BY MR. BISS: 19 Q At this point in time had you decided 20 to use a clip of the Flynn family in the report? 21 A I don't know. 22 (Exhibit 53 was marked.) 23 Q I'll show you a document I've marked 24 as Exhibit 53. It's an email chain including 25 emails from yourself to Richard Davis, Philippa</p>
<p style="text-align: right;">Page 323</p> <p>1 piece, yeah. 2 Q We'll look at a couple of documents 3 here in a second. Maybe that will refresh your 4 recollection. 5 I'll show you Exhibit 52. This is an 6 email from yourself to Richard Davis. 7 MS. BOLGER: You have about 15 8 minutes left of time. 9 MR. BISS: Not with all your 10 breaks we don't. 11 MS. BOLGER: Yes, we do. 12 MR. BISS: What's your total? 13 (Whereupon there was a discussion 14 off the record.) 15 (Whereupon there was a brief 16 recess from 6:15 p.m. until 6:26 p.m.) 17 (Exhibit 52 was marked.) 18 BY MR. BISS: 19 Q I've handed you a document that I've 20 marked as Exhibit 52. This is an email chain. 21 The first email is from Donie O'Sullivan to 22 Richard Davis and Philippa Holland. 23 Have you ever seen this document 24 before? 25 A Yep.</p>	<p style="text-align: right;">Page 325</p> <p>1 Holland, Amanda Hobor, Ashley Van Sant. The 2 email that I'm going to refer you to is the 3 middle of the first page, it's an email that you 4 sent February 3, 2021. 5 Did you prepare and send that email on 6 that date to those recipients? 7 A I would think so, yes. 8 Q And you write -- among other things, 9 you write, "I am going to do a first pass on the 10 script tonight. Get the triad going, et cetera, 11 and we can be ready for edit tomorrow p.m." 12 Do you see that? 13 A Yes. 14 Q What is triad? 15 A Triad is made up at CNN of fact 16 checking group called the row, because they sit 17 in a row. Standards, kind of look at the ethical 18 sides of the story and make sure they comply with 19 CNN standards, and it also includes legal. 20 Q Who was -- who are the persons 21 involved in fact checking? 22 A That would be the row and in this 23 case, Fuzz Hogan is the person from the row. 24 Q Standards, who was the person involved 25 in reviewing this piece from standards?</p>

<p style="text-align: right;">Page 326</p> <p>1 A Emma Lacey-Bordeaux. 2 Q And legal? 3 MS. BOLGER: You can say who it 4 was. 5 THE WITNESS: Steve Keel. 6 BY MR. BISS: 7 Q And all those folks were involved 8 in -- under this concept of Triad? 9 A Yes. 10 Q And what does the triad do? What -- 11 succinctly, what's its function? 12 A I guess overall it ensures that 13 stories comply with CNN standards, that they're 14 accurate. And -- yeah, and those three people -- 15 people I worked with over long term, so they 16 would work on a lot of my stories. 17 Q Do you know whether any member of 18 triad ever contacted the Flynn family to fact 19 check the story or verify its accuracy? 20 MS. BOLGER: I'm going to object 21 to the extent that question calls for 22 attorney-client communication. 23 Don't answer anything with 24 Mr. Keel, otherwise you can answer the 25 question.</p>	<p style="text-align: right;">Page 328</p> <p>1 A Yeah. PKG is TV package. 2 Q What's SOT? 3 A SOT is sound on tape. A sound bite, 4 basically. 5 Q What are the numbers under SOT? What 6 do they signify? 7 A They would be the numbers immediately 8 under -- 168, for instance, that is like the 9 internal CNN ID for video clip. So video clips 10 in the CNN internal system have individual 11 numbers. 12 Q You'll see that there is some 13 consistency between the first two SOTs. That 14 means they would come from the same video clip; 15 correct? 16 MS. BOLGER: Object to the form. 17 THE WITNESS: Yes. 18 BY MR. BISS: 19 Q What is TC? 20 A TC stands for time code. So the time 21 code within the clip. 22 Q Take a look -- what's track? 23 A Track is like the voiceover from the 24 correspondents. So me in this case. 25 Q N-A-T-S, NATS, if you will?</p>
<p style="text-align: right;">Page 327</p> <p>1 BY MR. BISS: 2 Q I'm not looking for your 3 communications with Mr. Keel. I want to know if 4 any member of the triad contacted the Flynn -- 5 A I don't know. 6 Q -- to fact check or verify the 7 accuracy of the story. 8 A I don't know. 9 Q Have you ever seen any documents in 10 which any member of the triad made any effort to 11 contact the Flynn? 12 A I don't think so. 13 (Exhibit 54 was marked.) 14 Q I'll show you a document that I have 15 marked as Exhibit 54. This is an email from 16 Philippa Holland to CNN Tonight's staff. Subject 17 is Donie Final Script. It was produced in 18 discovery by CNN. 19 I just want to ask you about some of 20 the phraseology of the document. This is a copy 21 of your final script for the February 4, 2021 22 report; correct? 23 A I believe so, yes. 24 Q What is -- we talked about PKG. What 25 is SOT?</p>	<p style="text-align: right;">Page 329</p> <p>1 A That sounds like natural sounds. It's 2 not necessarily a sound bite. It can be, you 3 know, somebody booing or jeering or in this case 4 people -- in this case, people kind of chanting, 5 I think. 6 Q Then the last two on this page, 7 track/vid? 8 A So that would be track, meaning I'm 9 going to voice it over. And the vid I think is 10 like an instruction to the editor, saying, 11 "Here's exactly the video you should use while 12 Donie," me, voices that over. 13 (Exhibit 55 was marked.) 14 Q I'll show you a document I've marked 15 as Exhibit 55. This is an email from Richard 16 Davis to CNN, Domestic Alert. Do you know what 17 this -- what the purpose of this email was? 18 A This would be to send out the 19 completed story internally within the network. 20 Q There was one mistake that Mr. Davis 21 caught, and that is if you turn to the second 22 page, CNN 664 at the top there, somebody had 23 struck through the word "one" and added "two." I 24 didn't see any others in this document. But were 25 you aware that he had caught a mistake of some</p>


<p style="text-align: right;">Page 330</p> <p>1 kind?</p> <p>2 MS. BOLGER: Object to the form.</p> <p>3 I'm not sure he caught it, but go ahead.</p> <p>4 THE WITNESS: I wasn't -- I can't</p> <p>5 recall.</p> <p>6 BY MR. BISS:</p> <p>7 Q Were you aware that somebody caught</p> <p>8 the one versus two?</p> <p>9 A I don't recall.</p> <p>10 Q Now Mr. Davis writes here, the subject</p> <p>11 matter of the email is CNN Goes Inside a</p> <p>12 Gathering of QAnon Supporters, as opposed to</p> <p>13 followers. Do you have any idea why Mr. Davis</p> <p>14 used the word "supporters" versus "followers"?</p> <p>15 MS. BOLGER: Object to the form.</p> <p>16 THE WITNESS: No.</p> <p>17 (Exhibit 56 was marked.)</p> <p>18 BY MR. BISS:</p> <p>19 Q I'll show you a document I've marked</p> <p>20 as Exhibit 56. This is an email chain. First</p> <p>21 email is from Lee Burack -- I hope I'm</p> <p>22 pronouncing that right -- to Ashley Van Sant and</p> <p>23 Tiffany Anthony. Subject matter is Donie's</p> <p>24 Script for Tonight.</p> <p>25 Who is Lee Burack?</p>	<p style="text-align: right;">Page 332</p> <p>1 BY MR. BISS:</p> <p>2 Q Did you instruct him to cut it in the</p> <p>3 manner in which it finally appeared in the</p> <p>4 published report on February 4, 2021? Did you</p> <p>5 tell him what to cut and what to keep?</p> <p>6 MS. BOLGER: Object to the form.</p> <p>7 THE WITNESS: I scripted as such.</p> <p>8 That would be in the script.</p> <p>9 BY MR. BISS:</p> <p>10 Q You told him "Where we go one, we go</p> <p>11 all," you told Burack to do that, and Burack then</p> <p>12 used the technology whatever way he needed to to</p> <p>13 cut the clip just to show "Where we go one, we go</p> <p>14 all"?</p> <p>15 MS. BOLGER: Objection to form. I</p> <p>16 think he said -- Donie said he wasn't sure</p> <p>17 it was Mr. Burack, but he thinks it was.</p> <p>18 Let's make sure we keep that consistent.</p> <p>19 THE WITNESS: Whoever cut us would</p> <p>20 have been doing it exactly based off the</p> <p>21 script here, which is how I outlined it.</p> <p>22 BY MR. BISS:</p> <p>23 Q Okay. So taking a look at your final</p> <p>24 script, where does the truncated clip up here in</p> <p>25 the Donie final script? Can you just identify</p>
<p style="text-align: right;">Page 331</p> <p>1 A I don't believe I ever met them, but I</p> <p>2 think they were likely the editor on this piece.</p> <p>3 Q Did you interact with him in</p> <p>4 connection with the production of the report?</p> <p>5 A I'm seeing there are some emails</p> <p>6 between he and I, yes.</p> <p>7 Q In the body of his email, on CNN 134</p> <p>8 he writes, quote, "By the way, I pulled some</p> <p>9 Trump with Flynn file if we want to do something</p> <p>10 like that to set up the Michael Flynn NAT?</p> <p>11 A Yes.</p> <p>12 Q What is the Michael Flynn NAT?</p> <p>13 A The Michael Flynn NAT would be the</p> <p>14 video of Michael Flynn saying "Where we go one,</p> <p>15 we go all."</p> <p>16 Q Does this suggest to you that</p> <p>17 Mr. Burack was the person who created that</p> <p>18 truncated clip?</p> <p>19 MS. BOLGER: Object to the form.</p> <p>20 I don't think that's what that says.</p> <p>21 THE WITNESS: I think he would</p> <p>22 have been, to the best of my knowledge,</p> <p>23 probably the person who physically put it</p> <p>24 together based off my script.</p> <p>25</p>	<p style="text-align: right;">Page 333</p> <p>1 that?</p> <p>2 A If you go to the second page, and it</p> <p>3 says third kind of paragraph down, "'Where we go</p> <p>4 one, we go all,' an infamous QAnon slogan." And</p> <p>5 then it states there, "Twitter Flynn video."</p> <p>6 Q Which exhibit are you on?</p> <p>7 A Fifty-five.</p> <p>8 MS. BOLGER: Page 135.</p> <p>9 BY MR. BISS:</p> <p>10 Q I'm looking at the final script.</p> <p>11 A Fifty-six, so on page -- sorry. Yeah,</p> <p>12 page 135, the top there. "'Where we go one, we</p> <p>13 go all,' infamous QAnon slogan."</p> <p>14 Q So it appears beneath the SOT</p> <p>15 16262483. "Twitter Flynn video"?</p> <p>16 A Yeah.</p> <p>17 Q TC00 "Where we go one, we go all,</p> <p>18 where we go one, we go all." So you would have</p> <p>19 instructed Burack or whoever created that</p> <p>20 truncated clip just to include "Where we go one,</p> <p>21 we go all"?</p> <p>22 A Yes.</p> <p>23 (Exhibit 57 was marked.)</p> <p>24 Q I'll show you a document, this is an</p> <p>25 email from Lee Burack to Van Sant and Anthony.</p>

<p style="text-align: right;">Page 334</p> <p>1 Have you ever seen this document</p> <p>2 before today?</p> <p>3 A No, I don't think so.</p> <p>4 (Exhibit 58 was marked.)</p> <p>5 Q I'll show you a document marked as</p> <p>6 Exhibit 58. This is an email chain from Van Sant</p> <p>7 and Burack and Anthony, another email that you're</p> <p>8 involved in, dated February 4 of 2021.</p> <p>9 Have you ever seen these documents</p> <p>10 before today or this email chain before today?</p> <p>11 MS. BOLGER: There's a lot of</p> <p>12 different components.</p> <p>13 BY MR. BISS:</p> <p>14 Q Have you ever seen this email chain</p> <p>15 before today?</p> <p>16 MS. BOLGER: Which portion do you</p> <p>17 mean?</p> <p>18 MR. BISS: The whole email chain,</p> <p>19 Kate. You don't have to interfere with my</p> <p>20 deposition. It's almost over.</p> <p>21 THE WITNESS: I only saw some</p> <p>22 emails. I'm not sure if I saw this one.</p> <p>23 BY MR. BISS:</p> <p>24 Q Ashley Van Sant is not a lawyer, is</p> <p>25 she?</p>	<p style="text-align: right;">Page 336</p> <p>1 Q Other than In The Matrix, did you</p> <p>2 reach out to any other source in connection with</p> <p>3 the February 4, 2021 report?</p> <p>4 MS. BOLGER: Object to form.</p> <p>5 THE WITNESS: I spoke to Travis</p> <p>6 Hughes, somebody who tracks QAnon. If I</p> <p>7 recall correctly, I think I may have reached</p> <p>8 out to Alan Hostetter on his website.</p> <p>9 BY MR. BISS:</p> <p>10 Q Why did you reach out to In The</p> <p>11 Matrix?</p> <p>12 A Because he's featured substantially in</p> <p>13 the story and is one of the people who's heard</p> <p>14 throughout the story.</p> <p>15 Q General Flynn is also featured</p> <p>16 prominently in the story. Why didn't you reach</p> <p>17 out to General Flynn?</p> <p>18 MS. BOLGER: Object to form.</p> <p>19 THE WITNESS: I don't think the</p> <p>20 characterization of "featured" is one I</p> <p>21 agree with. We had seen Flynn's statements</p> <p>22 through previous reporting.</p> <p>23 BY MR. BISS:</p> <p>24 Q In The Matrix isn't even mentioned in</p> <p>25 the report.</p>
<p style="text-align: right;">Page 335</p> <p>1 A Ashley is a producer.</p> <p>2 Q Lee Burack is not a lawyer, is he?</p> <p>3 A I don't believe so.</p> <p>4 Q Tiffany Anthony is not a lawyer?</p> <p>5 A I don't believe so.</p> <p>6 Q Do you know what was redacted as</p> <p>7 privileged in this document?</p> <p>8 MS. BOLGER: Just for the record,</p> <p>9 you can't answer that question because it</p> <p>10 would be revealing privileged</p> <p>11 communications.</p> <p>12 And I would remind you, Steven,</p> <p>13 that this is one of the documents that the</p> <p>14 court reviewed and withheld the privilege</p> <p>15 objection.</p> <p>16 (Exhibit 59 was marked.)</p> <p>17 BY MR. BISS:</p> <p>18 Q Mr. O'Sullivan, I show you a document</p> <p>19 that I have marked as Exhibit 59. It's an email</p> <p>20 chain, an email from yourself to Steve Keel,</p> <p>21 Lacey -- Emma Lacey-Bordeaux, Fuzz Hogan, and it</p> <p>22 includes an email chain or email communication</p> <p>23 between you and In The Matrix.</p> <p>24 Do you see that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 337</p> <p>1 A He's shown speaking in it.</p> <p>2 (Exhibit 60 was marked.)</p> <p>3 Q Second-to-last exhibit, I'm not going</p> <p>4 to ask you a lot about this document.</p> <p>5 MS. BOLGER: Could you tell me</p> <p>6 what it is?</p> <p>7 BY MR. BISS:</p> <p>8 Q Mr. O'Sullivan, I've handed you a copy</p> <p>9 of the CNN News Standards and Practices Policy</p> <p>10 Guide. It's Bates stamped CNN 1911 through 2000.</p> <p>11 Have you ever seen this document</p> <p>12 before?</p> <p>13 A I have, yes.</p> <p>14 Q As Mr. Zucker indicates in his letter,</p> <p>15 you have to review this and certify that you have</p> <p>16 reviewed it; correct?</p> <p>17 MS. BOLGER: Why don't you point</p> <p>18 the witness to what you're talking about.</p> <p>19 MR. BISS: No.</p> <p>20 MS. BOLGER: How can he know what</p> <p>21 you're saying is right?</p> <p>22 BY MR. BISS:</p> <p>23 Q You're aware that you have to certify</p> <p>24 that you have read the document; correct? You're</p> <p>25 aware of that?</p>

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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